

EXHIBIT JJ

1 IN THE UNITED STATES DISTRICT FOR THE
2 EASTERN DISTRICT OF PENNSYLVANIA

3
4 LISA BARBOUNIS,)
5 Plaintiff,)
6 v.) Civil Action
) No. 2:19-cv-05030
7 MIDDLE EASTERN)
8 FORUM, et al.,)
9 Defendants.)

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12 Deposition of MATTHEW BENNETT taken
13 via remote videoconferencing of all
14 participants, pursuant to notice, beginning
15 at 11:11 a.m., on Tuesday, November 10, 2020,
16 before Eleanor J. Schwandt, Registered Merit
17 Reporter and Notary Public.
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20 GREGG ROMAN
21 DANIEL PIPES

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<p>1 THE VIDEO SPECIALIST: We are 2 now on the record. Today's date is 3 Tuesday, November 10th, 2020, and the time 4 is 11:11 a.m. Eastern Standard Time. This 5 is the recorded video deposition of Matthew 6 Bennett in the matter of Lisa Barbounis 7 versus Middle Eastern Forum, et al., in the 8 United States District for the Eastern 9 District of Pennsylvania, Case No. 10 2:19-CV-05030. 11 My name is Jennifer Luu from 12 Everest Court Reporting, and I'm the video 13 specialist. The court reporter today is 14 Eleanor Schwandt, also from Everest Court 15 Reporting. 16 All counsel appearing today 17 will be noted on the stenographic record. 18 Will the court reporter please swear in the 19 witness. 20 MATTHEW BENNETT, 21 the witness herein, having first been 22 duly sworn on oath, was examined and 23 testified as follows: 24 25</p>	<p>1 here to rule on any objection today so a 2 judge will do that later. So kind of the 3 order is like I ask the question, no 4 objection, you answer. I ask a question, 5 objection, you answer, and unless you are 6 instructed not to by your lawyer. 7 And we will try to keep the 8 record clear that way so we try not to 9 interrupt each other. It is hard for our 10 court reporter to type two people talking 11 at the same time. I take it with Zoom it 12 is even harder because Zoom like cuts off 13 the microphone and only hears the person 14 talking or whatever. So, yes, do me a 15 favor, try to let me finish my question, 16 I'll let you try to finish your answer. We 17 will mess it up a few times today. But 18 does that sound okay? 19 A. Yep. 20 Q. The next thing is try to keep all 21 your answers verbal. Nods and shrugs and 22 mm-hmms and uh-uhs don't really have a lot 23 of meaning on the record. So if I prompt 24 you and say, yes or no, or whatever, I'm 25 not being aggressive or argumentative. I'm</p>
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<p>1 EXAMINATION 2 BY MR. CARSON: 3 Q. Good morning, Mr. Bennett. My name 4 is Seth Carson. I am Lisa Barbounis' 5 attorney. And we are here today to take 6 your, to conduct the deposition in the 7 matter of Lisa Barbounis versus the Middle 8 East Forum, Daniel Pipes and Gregg Roman. 9 To make things go smooth today 10 I'll just start by giving a couple ground 11 rules or suggestions. Have you ever done a 12 deposition before? 13 A. No. 14 Q. So it is a question and answer 15 session. I'll ask questions. You provide 16 answers. You can say yes, no, I don't 17 know, I don't remember. You can say 18 whatever other response that you think is 19 appropriate. And we are going to try to 20 keep a record clear, where I ask a 21 question, your lawyer might enter an 22 objection. Unless your lawyer says 23 objection and then directs you not to 24 answer the question, he is just putting the 25 objection on the record. There is no judge</p>	<p>1 just trying to keep the record clear. 2 Okay? 3 A. Okay. 4 Q. Say yes. 5 A. Yeah. 6 Q. Or if you don't understand 7 something I'm saying, tell me to rephrase 8 it or let me know, and I'll explain it and 9 give you more. 10 I guess that comes to my third, 11 my third suggestion is that I might ask a 12 bad question today, a crappy question 13 today. If I do, I'll rephrase it. Just 14 say you don't understand the question, and 15 I'll rephrase it or I'll try to think of 16 another way we can get to the information 17 we are talking about. Okay? 18 A. Okay. 19 Q. You understand that your testimony 20 today has the same force and effect as if 21 you were testifying in a courtroom, with a 22 judge and jury. So you have been sworn, 23 you are under oath, and so you have to tell 24 the truth today. You have to answer all 25 the questions truthfully, to the best of</p>

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<p>1 your knowledge. Right?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Can you please state your</p> <p>4 full name for the record.</p> <p>5 A. Matthew Phillip Bennett.</p> <p>6 Q. And where do you live, Mr. Bennett?</p> <p>7 A. You want the full address?</p> <p>8 Q. Yes, please.</p> <p>9 A. 4 Mercer Lane, Manalapan, New</p> <p>10 Jersey.</p> <p>11 Q. Manalapan?</p> <p>12 A. Yes.</p> <p>13 Q. How long have you been there for?</p> <p>14 A. Seven months.</p> <p>15 Q. What was your address before that?</p> <p>16 A. 236 East 47th Street, Apartment</p> <p>17 37C, New York, New York. I forget the zip</p> <p>18 code.</p> <p>19 Q. No problem. How long were you at</p> <p>20 the house in New York for?</p> <p>21 A. It was an apartment. And just</p> <p>22 under a year. When COVID began, we left</p> <p>23 the city. My wife were was pregnant.</p> <p>24 Q. Congratulations.</p> <p>25 A. Thank you.</p>	<p>1 Q. So like I asked you to describe</p> <p>2 your position at two different jobs. I</p> <p>3 guess since we are here today to talk about</p> <p>4 the Middle East Forum, it is kind of</p> <p>5 relegated to the Middle East Forum, like a</p> <p>6 description of your job while you were</p> <p>7 there.</p> <p>8 A. So the question is what is a</p> <p>9 description of my job at the Middle East</p> <p>10 Forum?</p> <p>11 Q. Yes. Thank you. Better way to</p> <p>12 state it.</p> <p>13 A. Okay. I was hired as the director</p> <p>14 of special projects, I believe that was in</p> <p>15 June or July 2015. And in that role I</p> <p>16 launched a young adult division, was</p> <p>17 responsible for writing some news letters,</p> <p>18 help out with fund raising, coordinating</p> <p>19 meetings. Development I believe was about</p> <p>20 33 percent of my portfolio, and, you know,</p> <p>21 was sort of a all-around, wearing different</p> <p>22 hats position. I would help out with</p> <p>23 whatever may be needed.</p> <p>24 Q. What does that mean, development is</p> <p>25 33 percent of your portfolio? What is that</p>
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<p>1 Q. And were you working in New York at</p> <p>2 the time? Is that why you were living in</p> <p>3 New York?</p> <p>4 A. Yes. I accepted a position in</p> <p>5 Manhattan and I moved nearby to that</p> <p>6 office.</p> <p>7 Q. What was that position? Where was</p> <p>8 that?</p> <p>9 A. That was at the Zionist</p> <p>10 Organization of America, and I was the</p> <p>11 national director of development.</p> <p>12 Q. What is the national director of</p> <p>13 the development, is that similar to your</p> <p>14 position when you worked with the Middle</p> <p>15 East Forum?</p> <p>16 A. Yes.</p> <p>17 Q. Did you basically do the same type</p> <p>18 of work?</p> <p>19 A. Yes.</p> <p>20 Q. Can you describe that work? And I</p> <p>21 guess since we are here today to talk about</p> <p>22 the Middle East Forum, if there is any</p> <p>23 differences, resolving what you did when</p> <p>24 you were at the Middle East Forum.</p> <p>25 A. What was that, the second part?</p>	<p>1 33 percent? What do you do?</p> <p>2 A. Fund raising, assisting with</p> <p>3 organizing, donor meetings, travel, events,</p> <p>4 anything that would be related to the</p> <p>5 eventual solicitation and receipt of</p> <p>6 contributions from donors.</p> <p>7 Q. Developing relationships with</p> <p>8 people who ultimately give the Forum money;</p> <p>9 is that kind of what it was?</p> <p>10 A. Not just money. It is also, you</p> <p>11 know, reach, influence. The goal is to</p> <p>12 influence policy, and, obviously, to do</p> <p>13 that you have to have a following and</p> <p>14 audience, so there has to be newsletters,</p> <p>15 subscribers, people reading, attending</p> <p>16 events, etcetera. So money is part of it.</p> <p>17 It is not all of it.</p> <p>18 Q. What, tell me what the Middle East</p> <p>19 Forum's mission was. What was your, what</p> <p>20 was the goal of the organization?</p> <p>21 A. Promote U.S. interests,</p> <p>22 domestically and abroad. That could fall</p> <p>23 under a wide range of different projects</p> <p>24 and activities.</p> <p>25 Q. So from a U.S. interest, was it in</p>

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<p>1 a specific given field or area? So in the 2 Middle East? Is it relegated to the Middle 3 East? 4 A. Sure. I mean, there is Middle East 5 and there is also Islamism, you know, which 6 is not defined by geographic area. It can 7 be different topics. There are, you know, 8 the campus project, Campus Watch, the, 9 maybe professors at universities who are 10 not acting in good faith or according to 11 how a professor may be expected to teach. 12 So there is different initiatives. Campus 13 Watch would be one of them. Islamist 14 Watch. There is, you know, it is all on 15 the website. 16 Q. And you said you began your 17 position with the Middle East Forum, was it 18 in June of 2015? 19 A. I believe so. I don't remember the 20 exact time or the exact month or day. 21 Q. Is it fair to say sometime around 22 2015? 23 A. Yeah, maybe it was -- actually, it 24 might have been '16. I was there for just 25 under three years and I left in --</p>	<p>1 Q. And the entire time between 2 sometime around June 2015 and March 2019 3 did you remain in that role as director of 4 development? 5 A. No. I stated previous, I started 6 as director of special projects. I was 7 promoted to the director of development at 8 some point at the end of that first, first 9 year, so I guess about five or six months. 10 And then I remained as director of 11 development until, until I left. 12 Q. So was there any time like, for 13 instance, after Mr. Roman stopped working 14 at the office when your responsibilities 15 increased? 16 A. Sorry, say that again. 17 Q. Was there any time when your 18 responsibilities increased and you did more 19 than just, when you maybe did the job as 20 the director for the Middle East Forum, did 21 that ever happen? 22 A. No. 23 Q. Let's go back to the beginning of 24 your employment at the Middle East Forum. 25 Who hired you?</p>
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<p>1 Q. Someone doesn't have their thing 2 muted. Sorry about that. 3 A. Yeah, I was there for just under 4 three years and I left in March of 2018. 5 So whatever 33 months is, you know, before 6 that. 7 Q. You were employed with the Middle 8 East Forum for about 33 months? 9 A. Yeah, I believe so, I mean. 10 Q. And your employment with the Middle 11 East Forum ended in March of 2019? 12 A. '18. 13 Q. I'm sorry. '18? 14 A. Right? No, no, I'm sorry. I'm 15 getting confused. Yeah, '19, '19. 16 Q. Yeah. So I think an event that 17 happened at the Middle East Forum that we 18 might use as like a marker to try to gauge 19 time might be November 4th of 2018 when you 20 had this group meeting where everyone -- 21 A. Yeah. Sorry. Messing up the 22 dates. But, yeah, that's right, November 23 4th, 2018. I left in March of 2019. 24 Q. Okay. 25 A. Yeah.</p>	<p>1 A. I interviewed initially with Thelma 2 Prosser, invited me for an interview. I 3 was interviewed then by Gregg Roman, I 4 believe twice, and then Daniel Pipes a 5 third time. 6 Q. When Thelma Prosser invited you for 7 an interview, do you remember what her 8 position was at that time? 9 A. I believe office manager, if I'm 10 not mistaken. 11 Q. At the time that Thelma Prosser 12 invited you for a position, do you remember 13 what Gregg Roman's position was at that 14 time? 15 A. A director. 16 Q. Did he hold any other positions 17 with the Middle East Forum? 18 A. I don't understand the question. 19 Q. So I think I have seen a hierarchy 20 where there is a board of governors. Is 21 Gregg Roman on the board of governors? 22 A. You mean as secretary? 23 Q. Is that your knowledge, that Gregg 24 Roman was the secretary on the board of 25 governors?</p>

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<p>1 A. No. But, I mean, at that time, I 2 don't recall. I don't know what his -- I 3 mean, I didn't remember what the -- if it 4 happened, maybe now, or it may be before. 5 I checked the website a couple months ago 6 and I think I saw it there.</p> <p>7 Q. Do you know when he was given that 8 title as secretary of the board of 9 governors?</p> <p>10 A. I don't even know what that is. I 11 don't even know what the secretary of the 12 board of governors entails.</p> <p>13 Q. Do you know what the board of 14 governors is?</p> <p>15 A. Yes, yes.</p> <p>16 Q. What is the board of governors?</p> <p>17 A. The group of people who are 18 responsible for the governance of, you 19 know, they are contributors, and there is 20 board meetings, there is annual meetings, 21 to which they are briefed on the ongoing 22 of the organization.</p> <p>23 Q. And do you know who sits on the 24 board of governors today?</p> <p>25 A. No. I have been with two other</p>	<p>1 Q. Who runs the organization, 2 generally? Or actually let's say 3 specifically for Middle East Forum.</p> <p>4 Strike that. Let's back up.</p> <p>5 So do you know who was on the board of 6 governors when you were the director of 7 development for the Middle East Forum?</p> <p>8 A. I mean, I believe there was about 9 40 different people. But to recall 10 specific names, no, I don't. I mean, 11 again, I've had to remember another 80 12 board members since I have left there. 13 But, I mean, it is all on the website. I'm 14 sure that --</p> <p>15 Q. Fair enough. So going back to your 16 interview, you said you interviewed twice 17 with Daniel -- I'm sorry -- with Gregg 18 Roman and then once with Daniel Pipes; is 19 that correct?</p> <p>20 A. Yes, I believe so.</p> <p>21 Q. And during that interview process, 22 when did you find out that you were going 23 to be offered a position with the Middle 24 East Forum?</p> <p>25 A. I guess it was in the weeks or</p>
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<p>1 organizations since, and, you know, I have 2 my own board of governors to keep track of. 3 I don't, I don't know who currently sits on 4 the board of governors, no.</p> <p>5 Q. In general, is the board of 6 governors, so not related to the Middle 7 East Forum, but since you deal with board 8 of governors today, in general what is a 9 board of governors?</p> <p>10 A. Well, it is called different things 11 at different places. It can be board of 12 directors, board of governors. Just a 13 board, board members. But they are a group 14 of donors who take interest in the 15 organization, sometimes, most often they 16 are contributors that can be invited to 17 take on like a lay leadership-type role, 18 where they can attend events and be asked 19 to invite friends to events to help 20 increase the awareness of and the reach of 21 the organization. So they are just people 22 from every walk of life.</p> <p>23 Q. Are they the people who actually 24 run the organization?</p> <p>25 A. Run the organization? No.</p>	<p>1 months following my final interview.</p> <p>2 Q. Do you know if it was like weeks or 3 months? Was it months after the final 4 interview? Or was it like not long after 5 that?</p> <p>6 A. I, I --</p> <p>7 Q. If you remember.</p> <p>8 A. I don't recall. I don't recall. I 9 mean, it was obviously some time between 10 the time I interviewed and the time that I 11 began.</p> <p>12 Q. That's right. I think that's fair 13 to say.</p> <p>14 So when you actually started, 15 that would be the date that you gave me, 16 some time around June 2015, that's when you 17 actually began --</p> <p>18 A. I believe. It could be May, June, 19 July of, yeah, of 2016. I believe it was 20 '16, not '15.</p> <p>21 Q. 2000 --</p> <p>22 A. 2015 I was --</p> <p>23 Q. '17, '18, '19, yeah.</p> <p>24 A. '15 I was the director of Jewish 25 Community Relations and the Israel Center</p>

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<p>1 for the Jewish Federation of Atlantic and 2 Cape May Counties.</p> <p>3 Q. Did you work with Gregg Roman when 4 you were at the Jewish Federation?</p> <p>5 A. Did I work with him? No. We had 6 met, after having not seen each other for a 7 number of years, at a JCPA conference in 8 Chicago. And we spoke there for the first 9 time in I don't remember how long. But he 10 was not at the Middle East Forum at that 11 time. He was at, he was the director of 12 Jewish Community Relations for Pittsburgh, 13 in Pittsburgh.</p> <p>14 Q. Is that the same Jewish Federation 15 or are there different Jewish Federations 16 situated in different areas of the state or 17 country?</p> <p>18 A. There is, it is like every city, 19 state has their own Jewish Federation. I 20 think there is 11 in the State of New 21 Jersey. There is one in Philadelphia, one 22 in New York. Various, you know, every 23 city, I think there is -- I don't know how 24 many there are today, but --</p> <p>25 Q. Are they all connected? Are they</p>	<p>1 office. Judy Goodrobb. You know, all of 2 the various project directors that may be 3 based elsewhere but would come to and from 4 the office when needed.</p> <p>5 Q. Samantha Mandeles, was she there 6 back then?</p> <p>7 A. I mean, she worked there. But I 8 don't remember. She didn't work in the 9 office, no. And I don't know if she was 10 employed at the time that I began. But I 11 know at some point she was employed there.</p> <p>12 Q. How about, was there someone named 13 Laura Frank?</p> <p>14 A. You asked when I began working 15 there, who were the people that were 16 working there, right?</p> <p>17 Q. Yeah. So if she wasn't there when 18 you started working there, I guess you can 19 just say no. I'm asking about when you 20 first started.</p> <p>21 A. Oh. So when I first started 22 working there, no, Laura Frank was not 23 there. And again, Samantha Mandeles, I 24 don't know when she began her tenure.</p> <p>25 Q. Laura Frank. I'm told there was</p>
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<p>1 like independent organizations?</p> <p>2 A. No, they are independent 3 organizations. It is like your local, you 4 know, community center has, you know, it 5 could be local, JCRC, local food bank, 6 etcetera.</p> <p>7 Q. And so when you first started at 8 the Middle East Forum, did you report to 9 the Philadelphia offices, located on I 10 believe it is Market Street in 11 Philadelphia, Pennsylvania?</p> <p>12 A. When I first started working there 13 did I work at the office on Market Street?</p> <p>14 Q. Yes, yes.</p> <p>15 A. Yes.</p> <p>16 Q. And who worked at that office when 17 you first started working there?</p> <p>18 A. Let me see, like go around the horn 19 so to speak. It was Tiffany Lee, Marnie 20 Meyer or Marnie O'Brien, Gary Gambill, Eman 21 Patel, Thelma Prosser.</p> <p>22 Occasionally there would be 23 others, you know, that weren't necessarily 24 based in the office, but that was, you 25 know, they would be in and out of the</p>	<p>1 another employee named Lara who worked 2 there around the same time that Laura Frank 3 worked there. Are you familiar with her?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know what Lara's last name 6 is?</p> <p>7 A. It began with an S and had some 8 funny spelling. Sort of like Scott, but I 9 know it is not Scott. I'm not sure exactly 10 what it was or is.</p> <p>11 Q. We can call her Lara Scott today 12 with the understanding that that is 13 probably not it.</p> <p>14 So at the time you started, 15 Gregg Roman, he was the director of the 16 Middle East Forum, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And what was his role as the 19 director of the Middle East Forum when you 20 started?</p> <p>21 A. Day-to-day operations, fund 22 raising, content, you know, development, 23 marketing. He oversaw the, ran the 24 organization, operationally.</p> <p>25 Q. Was there any position higher than</p>

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<p>1 director?</p> <p>2 A. Was there any position higher than</p> <p>3 director? Among the other people that you</p> <p>4 just mentioned? I mean --</p> <p>5 Q. No, among everybody.</p> <p>6 A. I mean, Daniel Pipes is the</p> <p>7 president of the organization, so if that's</p> <p>8 what you are asking.</p> <p>9 Q. President, as president, that's</p> <p>10 not, -- president is his title as an</p> <p>11 officer among the board of governors,</p> <p>12 correct?</p> <p>13 A. I don't know exactly what the -- I</p> <p>14 don't know what the question is. I don't</p> <p>15 know what -- you are asking if Daniel is</p> <p>16 higher ranked than Gregg in the</p> <p>17 organization?</p> <p>18 Q. I'm asking if there is any employee</p> <p>19 with a higher rank than Gregg Roman, the</p> <p>20 director, at that time?</p> <p>21 A. Well, if there was, it would be</p> <p>22 Daniel. I'm not sure if you are</p> <p>23 considering that Daniel is a board member</p> <p>24 or considering that he is a employee of the</p> <p>25 organization.</p>	<p>1 Q. And do you know how long, do you</p> <p>2 know when Tiffany Lee's employment with the</p> <p>3 Middle East Forum ended?</p> <p>4 A. Yeah, I want to say probably</p> <p>5 December of, maybe November/December of the</p> <p>6 same year that I began.</p> <p>7 Q. That's November/December 2016,</p> <p>8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. And is the reason you are aware of</p> <p>11 that date is because you became the</p> <p>12 director of development after her</p> <p>13 employment ended?</p> <p>14 A. Yeah, I remember that after</p> <p>15 approximately five to six months at the</p> <p>16 beginning I was promoted to the director of</p> <p>17 development. So I'm estimating five or six</p> <p>18 months from the time that I began to, you</p> <p>19 know, for which I believe is December.</p> <p>20 Q. And you replaced Tiffany Lee after</p> <p>21 she left, correct?</p> <p>22 A. Yes, I took that, I took on that</p> <p>23 role.</p> <p>24 Q. Do you know why her employment with</p> <p>25 the Middle East Forum ended?</p>
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<p>1 Q. Other than Daniel, is there anybody</p> <p>2 else? Is there any other position?</p> <p>3 A. Not that I know of.</p> <p>4 Q. Let's talk about Tiffany Lee for a</p> <p>5 moment, please. You said Tiffany Lee</p> <p>6 started, or, I'm sorry, was already an</p> <p>7 employee of the Middle East Forum when you</p> <p>8 first began your employment; is that</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know what her position was</p> <p>12 at that time?</p> <p>13 A. Director of development.</p> <p>14 Q. So is director of special projects</p> <p>15 and director of development, are those</p> <p>16 parallel positions, like neither one is the</p> <p>17 supervisor of the other? They are two</p> <p>18 different departments, I guess is a way to</p> <p>19 say it?</p> <p>20 A. Sort of. When I said previously</p> <p>21 that my portfolio included a percentage of</p> <p>22 development work, that would be the 33</p> <p>23 percent of my time Tiffany Lee would, you</p> <p>24 know, direct me on what to do. The rest I</p> <p>25 would report to Gregg.</p>	<p>1 A. She, well, she failed at doing the</p> <p>2 job that, raising money, developing</p> <p>3 content, at organizing events, managing</p> <p>4 other employees in the office who said she</p> <p>5 was terrorizing them.</p> <p>6 Me personally, she would ask me</p> <p>7 to, you know, to carry out assignments that</p> <p>8 I didn't believe Daniel or Gregg knew</p> <p>9 about. And I asked her constantly, please</p> <p>10 put that in writing to make sure I'm</p> <p>11 working on something that, you know, that</p> <p>12 my boss is aware of that you are assigning</p> <p>13 me to do.</p> <p>14 One day she was screaming at a</p> <p>15 janitor inside of the office. You know, I</p> <p>16 mean, I would say biggest reason, the</p> <p>17 number one reason is that she, besides the</p> <p>18 fact that other employees I believe had</p> <p>19 complained about her, is that she was</p> <p>20 delinquent in her responsibilities to raise</p> <p>21 funds and to successfully promote the</p> <p>22 interests of the organization.</p> <p>23 Q. Do you know if that's the reasons</p> <p>24 why she was terminated? Or, well, tell me</p> <p>25 your knowledge related to the reasons why</p>

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<p>1 she was actually terminated. Strike that.</p> <p>2 Do you know whether she was</p> <p>3 terminated or whether she resigned when it</p> <p>4 ended?</p> <p>5 A. No, I was never -- I remember, I</p> <p>6 wasn't in the office the day that it</p> <p>7 happened. I think it was Halloween, maybe,</p> <p>8 now that I remember. It may have been</p> <p>9 Halloween, because I remember Marnie told</p> <p>10 me that she had, that she was the one who</p> <p>11 had escorted her out of the office, and</p> <p>12 Tiffany was demanding to take papers and</p> <p>13 files out of her office, and Marnie</p> <p>14 prevented her from doing that.</p> <p>15 And then in recounting that</p> <p>16 story to me, I knew that, you know, she had</p> <p>17 left. I don't know what -- maybe she</p> <p>18 resigned before that and then they asked</p> <p>19 her to go, or if she was terminated.</p> <p>20 Q. Do you know whether she ever</p> <p>21 reported any issues related to sexual</p> <p>22 harassment during her employment?</p> <p>23 A. During her employment, no. I</p> <p>24 believe after she said that she was</p> <p>25 discriminated against or felt that because</p>	<p>1 Q. Take your time.</p> <p>2 A. I don't remember who told me. I</p> <p>3 just remember that she said, I don't know,</p> <p>4 she had felt -- that she claimed something</p> <p>5 or alleged something, which I had no</p> <p>6 knowledge of.</p> <p>7 Q. Do you remember what the</p> <p>8 allegations were?</p> <p>9 MR. GOLD: Asked and answered.</p> <p>10 THE COURT REPORTER: I'm sorry,</p> <p>11 who spoke, please?</p> <p>12 MR. GOLD: Mr. Gold. I'm</p> <p>13 representing Mr. Bennett here today.</p> <p>14 THE COURT REPORTER: Thank you.</p> <p>15 MR. GOLD: The question has</p> <p>16 been asked and answered already. Move on.</p> <p>17 THE WITNESS: I believe that it</p> <p>18 was after she had been -- after she had</p> <p>19 parted ways with the organization, then at</p> <p>20 some point something came up. There was --</p> <p>21 I definitely, while she was there, had no</p> <p>22 knowledge or I don't believe anything was</p> <p>23 ever claimed or whatever.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. You don't know anything about a</p>
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<p>1 she was a woman or something. It was at</p> <p>2 that point that I, I made it known that I</p> <p>3 felt that she had harassed me, to come to</p> <p>4 my office in a short skirt, crossing,</p> <p>5 uncrossing her legs in front of me, saying,</p> <p>6 Matt, will you please do this for me, or,</p> <p>7 Matt, can you do that for me, then, you</p> <p>8 know, things that I believe that had been</p> <p>9 assigned to her. And she was partially my</p> <p>10 boss.</p> <p>11 And at the time, before I had</p> <p>12 asked her to put, you know, things in</p> <p>13 writing that I believe demonstrated she was</p> <p>14 not fit to be in that role, which I was</p> <p>15 hesitant to do because I knew that it would</p> <p>16 look as if I was, you know, aiming for</p> <p>17 that, for her, for her job.</p> <p>18 Q. Do you know if she ever reported</p> <p>19 any issues of sexual harassment related to</p> <p>20 Gregg Roman?</p> <p>21 A. There was a story that I believe</p> <p>22 she had said, which I had no knowledge of.</p> <p>23 And --</p> <p>24 Q. How did you hear about it?</p> <p>25 A. I'm trying to remember.</p>	<p>1 couch that Gregg Roman and Tiffany had sex</p> <p>2 on during the --</p> <p>3 A. What was that?</p> <p>4 Q. I asked you if you know anything</p> <p>5 about a couch that they had sex on in the</p> <p>6 Philadelphia office, Gregg Roman and</p> <p>7 Tiffany Lee?</p> <p>8 A. I'm sorry, I don't mean to laugh.</p> <p>9 No, definitely, definitely not.</p> <p>10 Q. You are allowed to laugh. The</p> <p>11 court reporter will write down you are</p> <p>12 smiling. You can --</p> <p>13 A. No, I definitely do not know of</p> <p>14 anything about the couch and no relations</p> <p>15 between the two of them.</p> <p>16 Q. Did you ever see Gregg Roman act</p> <p>17 inappropriately toward her?</p> <p>18 A. No.</p> <p>19 Q. Did you ever tell Patricia McNulty</p> <p>20 that you saw Gregg Roman acting</p> <p>21 inappropriately toward her?</p> <p>22 A. No, I don't believe I did.</p> <p>23 Q. So is Patricia McNulty lying when</p> <p>24 she testifies that you told her that?</p> <p>25 A. Yeah, I believe so. I believe so.</p>

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<p>1 Q. And have you ever seen Gregg Roman</p> <p>2 act inappropriately to any female employee?</p> <p>3 A. No.</p> <p>4 Q. Have you ever seen Gregg Roman</p> <p>5 sexually harass any female employee?</p> <p>6 A. Have I ever seen Gregg harass</p> <p>7 anybody, no.</p> <p>8 Q. Have you ever seen Gregg -- that</p> <p>9 wasn't my question. My question was: Have</p> <p>10 you ever seen Gregg Roman sexually harass</p> <p>11 any female employee who worked at the</p> <p>12 Middle East Forum?</p> <p>13 A. No, definitely not.</p> <p>14 Q. Have you ever said that you saw</p> <p>15 Gregg Roman sexually harass a female</p> <p>16 employee at the Middle East Forum?</p> <p>17 A. Have I ever said that I saw, is</p> <p>18 that the question?</p> <p>19 Q. Yes.</p> <p>20 A. No.</p> <p>21 Q. You never told Daniel Pipes that</p> <p>22 Gregg Roman acted inappropriately toward</p> <p>23 female employees at the Middle East Forum?</p> <p>24 A. Well, we are going to have to back</p> <p>25 up timeline-wise to understand that.</p>	<p>1 things. And in a meeting which I believe</p> <p>2 was November 5th of 2018, you know, when</p> <p>3 those things were being outed or claimed or</p> <p>4 whatever about Gregg, Marnie and Lisa</p> <p>5 proceeded to call me a pussy and said they</p> <p>6 would never trust me because I did not</p> <p>7 demand to have Daniel fire Gregg</p> <p>8 immediately, during that meeting. And that</p> <p>9 was the beginning of a ridiculous time at</p> <p>10 MEF.</p> <p>11 Q. You don't believe that those things</p> <p>12 happened today?</p> <p>13 A. I have no way to know. I have</p> <p>14 never visually, physically seen anything.</p> <p>15 All I have is, was -- were things people</p> <p>16 told me after the fact, sometimes weeks or</p> <p>17 months after. And at this point, I don't</p> <p>18 -- I have no way to -- I have no way to</p> <p>19 tell -- I mean, based on the ridiculous</p> <p>20 things that I saw that were written about</p> <p>21 me, I, I have no way to give credit to</p> <p>22 anything that was said about Gregg. I have</p> <p>23 no -- never saw anything, never witnessed</p> <p>24 anything, no.</p> <p>25 Q. Do you think you sound credible</p>
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<p>1 But I was told or there were</p> <p>2 several rumors by other people that things</p> <p>3 had happened, and at the time I believed</p> <p>4 them because I had no reason not to.</p> <p>5 So, yes. And then at some</p> <p>6 point I believe I told Daniel, after</p> <p>7 November the 5th or whatever this meeting</p> <p>8 took place, or following a letter that was,</p> <p>9 that Marnie and Lisa and Tricia penned to</p> <p>10 Daniel, following that.</p> <p>11 Q. What did you say?</p> <p>12 A. I don't even, I don't remember.</p> <p>13 Q. Well, why did you say that at the</p> <p>14 time you believed them, that you had no</p> <p>15 reason not to?</p> <p>16 A. Well, it was, it was alarming that,</p> <p>17 I don't know, that people that I work with</p> <p>18 every day all of a sudden had all these</p> <p>19 allegations that I believe as like a friend</p> <p>20 that would have made, they would have made</p> <p>21 aware to me, you know, prior to the point</p> <p>22 where it came out in like an explosive</p> <p>23 manner.</p> <p>24 So, you know, at first I</p> <p>25 didn't, I didn't believe some of the</p>	<p>1 right now?</p> <p>2 A. Do I think I sound credible?</p> <p>3 Q. Yeah. Do you think you sound</p> <p>4 credible right now?</p> <p>5 A. I don't think, I don't think it</p> <p>6 matters.</p> <p>7 MR. WALTON: Objection,</p> <p>8 argumentative. That's Dave Walton for MEF.</p> <p>9 I just want to place an objection that's</p> <p>10 argumentative. But you can answer, Mr.</p> <p>11 Bennett.</p> <p>12 MR. CARSON: I think he</p> <p>13 answered.</p> <p>14 MR. WALTON: Then move on.</p> <p>15 MR. CARSON: I'm happy to move</p> <p>16 on.</p> <p>17 THE WITNESS: Where do I start?</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Okay. So sitting here today, you</p> <p>20 have no reason to disbelieve or believe?</p> <p>21 You have no knowledge related to any of the</p> <p>22 allegations that any of the people, that</p> <p>23 Lisa Barbounis made against Gregg Roman?</p> <p>24 MR. GOLD: Asked and answered.</p> <p>25 The next question. Don't answer.</p>

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<p>1 A. I don't know what allegations 2 specifically you are referring to. 3 MR. GOLD: Matt, if I tell you 4 not to answer a question, don't answer a 5 question. 6 MR. CARSON: You can't tell him 7 not to answer that question. 8 MR. GOLD: Absolutely, I can. 9 I can direct him not to answer a question. 10 MR. CARSON: We are going to 11 stop and call Judge Wolson. 12 MR. GOLD: Call him. 13 MR. CARSON: Yeah. No. We are 14 going to stop and call him if you direct 15 him not to answer the question. 16 MR. GOLD: He answered the 17 question. He said he has no personal 18 knowledge and you asked the question again. 19 One more question. Go ahead. Repeat the 20 question. 21 MR. CARSON: It is not going to 22 be one more. 23 MR. GOLD: All right. Well, go 24 ahead. 25</p>	<p>1 believed, but today you don't; is that your 2 testimony? 3 A. I don't even remember what I was 4 aware of at that point. I was showed 5 screen shots of messages that were sent and 6 then deleted. I think it was before that. 7 But to answer your question, on 8 November the 4th, yeah, I was riled up by 9 what I had been told. There was a letter 10 written, and I was mentioned in that 11 letter, and I didn't know in what context 12 and for what reason, and on November, yeah, 13 whatever it was, the 5th, I believe, or the 14 4th, whatever the date of that meeting was, 15 I was trying to -- sorry, hold on one 16 second. I'm sorry, is it okay if the dog 17 sits on my lap? She is barking. 18 Q. I don't have any objection to that. 19 A. Okay. Sorry, will you remind me 20 where we were? 21 Q. You were testifying about whether 22 or not on November 4th, 2018, you indicated 23 that you believed these women's allegations 24 of sexual harassment related to Gregg 25 Roman?</p>
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<p>1 BY MR. CARSON: 2 Q. We will start with the question: 3 Sitting here today, do you believe the 4 allegations that Lisa has made in her 5 lawsuit? 6 A. Can you -- what allegations? 7 Q. Do you believe Lisa Barbounis was 8 sexually harassed by Gregg Roman? 9 A. No. 10 Q. Do you believe Patricia McNulty was 11 sexually harassed by Gregg Roman? 12 A. No. 13 Q. But you said you believe they were 14 on November 4th, 2018, correct? 15 A. Yeah. 16 MR. GOLD: Objection. That's 17 not an accurate representation of his 18 testimony. But you can answer. Go ahead, 19 Matt. 20 Q. Well, you said you believed they 21 were on November 4th, 2018, correct? 22 A. They took it to a level that would 23 make it difficult for anyone not to 24 believe. 25 Q. So on November 4th, 2018, you</p>	<p>1 A. Yeah. They had took it to a level 2 that would make it difficult to believe 3 that that was not the case. So, I mean, 4 you know, put everybody else's employment 5 on the line or in jeopardy. Yeah, it was 6 at a level that why would anybody do that 7 unless it was true. 8 Q. Okay. So you believed them then, 9 and you don't believe them now; is that 10 your testimony? 11 A. I would say, yeah, I don't believe 12 them now. I mean, I believe that they were 13 saying things that they had never said 14 before. And, look, at the time I was -- I 15 broke my foot, then I had double pink eye. 16 I used my vacation time to work a 17 conference in California. 18 My wife was pregnant. We were 19 told that the baby had a genetic disease, 20 and we had to terminate the pregnancy, and 21 we did terminate the pregnancy. I was 22 struggling personally to cope with my 23 personal life, and work was the one place 24 that I would be able to feel that I have 25 like a stable environment, as my personal</p>

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<p>1 life was deteriorating.</p> <p>2 So when the people that I, you</p> <p>3 know, Tricia and Lisa and my colleagues in</p> <p>4 the office, they were the people I sent the</p> <p>5 ultrasound of my baby to, to say, guys,</p> <p>6 look, first people I told I was pregnant.</p> <p>7 They were my best friends there. They were</p> <p>8 my best friends in life, Gregg and all of</p> <p>9 them. All I had was my work life. I was</p> <p>10 dedicated to that.</p> <p>11 And when all of a sudden they</p> <p>12 came out saying these things, then, you</p> <p>13 know, I'm in a position, I have all these</p> <p>14 friendships, I have life hanging heavy on</p> <p>15 my head, and I believed it, yeah.</p> <p>16 Q. And you don't believe them today,</p> <p>17 correct?</p> <p>18 A. I have reason -- I mean, when</p> <p>19 someone had the, had the not -- said things</p> <p>20 that I believe are lies about myself or</p> <p>21 that are lies about myself, and other</p> <p>22 things that they recalled that I know are</p> <p>23 not true, or I recall them very</p> <p>24 differently, then, yes, it leads me to cast</p> <p>25 a doubt on anything and everything that</p>	<p>1 baby-sat my daughter, Catriona and Delany</p> <p>2 wanted to rent my house. I mean, these are</p> <p>3 my friends.</p> <p>4 I have a picture of us sitting</p> <p>5 at Continental Midtown, the day before I</p> <p>6 left, going away, and all of a sudden then</p> <p>7 two months later I get a paper that says</p> <p>8 that I'm some horrible person, and that</p> <p>9 their whatever is gone, their employment</p> <p>10 after I had left was somehow -- I'm</p> <p>11 responsible for, or that I didn't report</p> <p>12 something, which they say that I should</p> <p>13 have reported or did something.</p> <p>14 I mean, these are my friends.</p> <p>15 We went out drinking. We went out every</p> <p>16 week, every month, phone calls.</p> <p>17 I hung out with Lisa's husband.</p> <p>18 He we got beers at the bar, and wings,</p> <p>19 watched the Eagles game. I mean, like</p> <p>20 these were, these were people who I</p> <p>21 socialized with on a daily, weekly, monthly</p> <p>22 basis for the entire time that they were</p> <p>23 employed there. Up to the day that I left</p> <p>24 they were my friends.</p> <p>25 They called, they called my</p>
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<p>1 they said or were their reasons for even</p> <p>2 saying them.</p> <p>3 Q. Well, give me an example. What are</p> <p>4 these things that, let's relegate it to</p> <p>5 Lisa since you are here today to testify</p> <p>6 about Lisa's case.</p> <p>7 A. Okay.</p> <p>8 Q. So what has Lisa said about you</p> <p>9 that you know not to be true?</p> <p>10 A. I mean, it has been awhile since I</p> <p>11 was delivered this, the packet by the</p> <p>12 process server or whatever.</p> <p>13 Q. I can put it in front of you if it</p> <p>14 will help.</p> <p>15 A. If you could just tell me and then</p> <p>16 I'll respond to it.</p> <p>17 Q. Well, it is a 60-page complaint so</p> <p>18 I think I would show it you.</p> <p>19 A. Exactly, so somebody who makes a</p> <p>20 60-page complaint, after they threw me a</p> <p>21 going away party on the day before I left,</p> <p>22 I attended Lisa's son's birthday party and</p> <p>23 sat a table with her parents, she and her</p> <p>24 husband attended my daughter's first</p> <p>25 birthday party with my parents, Tricia</p>	<p>1 wife, we are worried about Matt, he hasn't</p> <p>2 been to work, what is going on. And then</p> <p>3 all of a sudden now I'm enemy of the state.</p> <p>4 Q. Well --</p> <p>5 A. What happened between the time that</p> <p>6 I left and the time that all of a sudden I</p> <p>7 became persona non grata, un-friended on</p> <p>8 Facebook? What did I do in the two months</p> <p>9 that I didn't talk to them that made that</p> <p>10 happen?</p> <p>11 Q. Well, what has Lisa Barbounis said</p> <p>12 about you that's not true? Has she said</p> <p>13 anything about you that's not true?</p> <p>14 A. I'm not going to -- put it on the</p> <p>15 screen or read it to me, and then we will</p> <p>16 go through one by one.</p> <p>17 Q. All right. So I would be happy to</p> <p>18 do that. Is the document you are referring</p> <p>19 to her complaint?</p> <p>20 A. I don't remember. It is whatever</p> <p>21 the thing that was delivered to my house</p> <p>22 probably over a year ago at this point,</p> <p>23 whatever.</p> <p>24 Q. I want to put a complaint on the</p> <p>25 screen. You do know that you are not, you</p>

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<p>1 are not a defendant in Lisa's case, right?</p> <p>2 A. I believe I was at some point, and</p> <p>3 now, then, now I'm not. Is that a correct</p> <p>4 understanding of it?</p> <p>5 Q. You were dismissed from her case,</p> <p>6 right? Did you know that?</p> <p>7 A. No, to be honest with you. I'm</p> <p>8 trying to stay -- look, I have a newborn</p> <p>9 baby at home. I just bought a house. I</p> <p>10 just had to flee New York City with a</p> <p>11 pregnant wife in a pandemic. I'm trying to</p> <p>12 keep toxic things out of my life. So, no</p> <p>13 I'm not aware of what is going on.</p> <p>14 But if you put it up on the</p> <p>15 screen and I read it, then I can recount to</p> <p>16 what I do remember at that time.</p> <p>17 Q. Well, do you know that you were</p> <p>18 dismissed from Lisa's case pursuant to an</p> <p>19 agreement that Lisa made with, with you,</p> <p>20 to--</p> <p>21 A. An agreement?</p> <p>22 Q. Yeah, it's called a stipulation.</p> <p>23 Did you know that you were dismissed from</p> <p>24 the case pursuant to a stipulation?</p> <p>25 A. You are saying that she made an</p>	<p>1 A. I mean, I don't know what the</p> <p>2 difference is, to be honest with you, I</p> <p>3 don't know what the difference is between</p> <p>4 whatever those documents were that were</p> <p>5 delivered and whatever is going on now. I</p> <p>6 don't know what the -- what was removed,</p> <p>7 added, agreed upon, the details, no. I</p> <p>8 don't.</p> <p>9 So I don't know what -- I</p> <p>10 remember reading things in a set of</p> <p>11 documents, which were ridiculous, and</p> <p>12 thinking how could, how could people I</p> <p>13 called my friends do this to me or say this</p> <p>14 about me. And then, I don't know what is</p> <p>15 there now. So, no.</p> <p>16 Q. But you don't remember any specific</p> <p>17 things? Because the reason, and I'll tell</p> <p>18 you the reason I'm asking is because you</p> <p>19 said this is the reason you have changed</p> <p>20 your mind. This is the reason you testify</p> <p>21 that you believed them on November 4th,</p> <p>22 2018, but you don't believe them now,</p> <p>23 because of these things you read. So</p> <p>24 that's the only reason I'm trying to</p> <p>25 identify what you read that caused you to</p>
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<p>1 agreement with me?</p> <p>2 Q. Yeah, through your lawyers, to</p> <p>3 dismiss you from the case.</p> <p>4 A. Oh, oh. Yeah. I thought you were</p> <p>5 insinuating or claiming I had some contact</p> <p>6 with her between the time, whatever, and</p> <p>7 now. Yes.</p> <p>8 Q. Were you aware that that -- I'm</p> <p>9 sorry to interrupt. Were you aware that</p> <p>10 that is the reason you are no longer part</p> <p>11 of her case?</p> <p>12 A. Yes, yes. I don't know all the</p> <p>13 details, but, yes, I'm aware that there was</p> <p>14 an agreement and that I was -- that I am no</p> <p>15 longer a party to it.</p> <p>16 Q. Do you know that the reason why the</p> <p>17 stipulation was agreed to is because she</p> <p>18 made no allegations concerning you in her</p> <p>19 complaint? Are you aware of that?</p> <p>20 A. Sorry, repeat that again.</p> <p>21 Q. Are you aware that she made no</p> <p>22 allegations concerning you and harassment</p> <p>23 in her complaint?</p> <p>24 A. Well, I would hope not. Like what?</p> <p>25 Q. Right.</p>	<p>1 dramatically change your mind.</p> <p>2 A. Well, I don't know specifically who</p> <p>3 said what, but if they are saying that I</p> <p>4 was supposed to -- that some things, the</p> <p>5 instance on the Israel trip, that I was</p> <p>6 supposed to be the person to go on, and I</p> <p>7 didn't go on that trip, and that I believe</p> <p>8 they said a complaint was made to me about</p> <p>9 it, and that I didn't report it.</p> <p>10 I'm not sure who said that or</p> <p>11 what case or whatever it was in. But my</p> <p>12 specific recollection of that is Lisa came</p> <p>13 back, we were having lunch downstairs</p> <p>14 underneath in the cafeteria place, talked</p> <p>15 about the trip, and she said: Gregg was</p> <p>16 acting like a dork on the couch.</p> <p>17 And I remember she said the</p> <p>18 word "dork," which I thought was strange,</p> <p>19 because I don't know she uses that word.</p> <p>20 But then later she had felt that or alleged</p> <p>21 that, I don't know, what was obviously much</p> <p>22 more than that, and then I was shown text</p> <p>23 messages that said she was --</p> <p>24 Q. Sorry, but there is some sort of</p> <p>25 clicking. I'm not sure what that is.</p>

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<p>1 A. It is not me.</p> <p>2 THE VIDEO SPECIALIST: Can we</p> <p>3 go off the record.</p> <p>4 (Discussion off the record.)</p> <p>5 THE VIDEO SPECIALIST: Back on</p> <p>6 the record.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Sorry about that, Mr. Bennett.</p> <p>9 A. That's okay.</p> <p>10 Q. So since you brought it up, let's</p> <p>11 just talk about the Israel trip for a</p> <p>12 minute. So you just mentioned that someone</p> <p>13 alleged that you were supposed to go on</p> <p>14 that trip. You were never supposed to go</p> <p>15 on that trip, correct?</p> <p>16 A. No, I was. And at the time that my</p> <p>17 wife had either just given birth or was</p> <p>18 about to give birth, and I told Gregg, I</p> <p>19 said, I can't, I can't leave her, you know,</p> <p>20 take somebody else.</p> <p>21 I believe he asked maybe</p> <p>22 Marnie. And then I don't think Marnie --</p> <p>23 obviously, Marnie didn't go. And then I</p> <p>24 believe Lisa went.</p> <p>25 Q. Do you know why Marnie wouldn't go?</p>	<p>1 etcetera.</p> <p>2 I had intimate knowledge of the</p> <p>3 inner-workings of the organization, so I</p> <p>4 would be able to relay, relay that back to</p> <p>5 whatever department or project would have</p> <p>6 then made use of that, so, you know,</p> <p>7 California, Florida.</p> <p>8 Q. My only question --</p> <p>9 A. Chicago.</p> <p>10 Q. -- was whether he sent you an</p> <p>11 e-mail asking you to go?</p> <p>12 A. I mean, if there is, I'm sure it is</p> <p>13 in some, in some MEF e-mails. But I don't</p> <p>14 recall an e-mail or text message.</p> <p>15 Q. You haven't read any e-mails or</p> <p>16 texts where he mentioned asking you to go</p> <p>17 to the Israel trip, correct?</p> <p>18 A. When?</p> <p>19 Q. Ever?</p> <p>20 A. No, I don't recall.</p> <p>21 Q. In your life?</p> <p>22 MR. GOLD: Asked and answered.</p> <p>23 He said he didn't recall.</p> <p>24 Q. It is your testimony, right, you</p> <p>25 have never read, you have never seen any</p>
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<p>1 A. I don't know. I mean, I would</p> <p>2 have, I would have been glad to go. I'm</p> <p>3 not sure why she didn't go.</p> <p>4 Q. Did Gregg send you any text</p> <p>5 messages where he asked you to go on this</p> <p>6 Israel trip?</p> <p>7 A. Text message?</p> <p>8 Q. Yes.</p> <p>9 A. I don't believe so. I mean, it was</p> <p>10 probably either discussion in the office or</p> <p>11 -- no, I don't remember, I don't recall any</p> <p>12 text messages saying come with me to Israel</p> <p>13 or whatever.</p> <p>14 Q. Is there any e-mails --</p> <p>15 A. But we -- on all of Gregg's fund</p> <p>16 raising trips, in travel, and work, you</p> <p>17 know, I was the logical person to go</p> <p>18 because I had knowledge of the content of</p> <p>19 the work being done by the organization. I</p> <p>20 had the ability to sit in on meetings and</p> <p>21 process high-level information and relate</p> <p>22 that to the strategy of the organization,</p> <p>23 how we are best able to leverage</p> <p>24 relationships with vendors, key people, you</p> <p>25 know, promote our interests and influence,</p>	<p>1 e-mail, text message, electronic</p> <p>2 communication of any kind where Gregg Roman</p> <p>3 asked you to go on that this trip, correct?</p> <p>4 MR. GOLD: Matt, don't answer</p> <p>5 that. Matt, don't answer that. Just let</p> <p>6 me place my objection.</p> <p>7 Seth, he said he doesn't recall</p> <p>8 any. He said it about three different</p> <p>9 times. He didn't say he never read one.</p> <p>10 He said he didn't recall.</p> <p>11 MR. CARSON: Okay.</p> <p>12 MR. GOLD: He said it three</p> <p>13 different times.</p> <p>14 MR. CARSON: That's why I said</p> <p>15 "correct" at the end. It was a question.</p> <p>16 MR. GOLD: I know, but you have</p> <p>17 prior --</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Have you read any of these text</p> <p>20 messages, have you ever read a text</p> <p>21 message, e-mail, electronic communication</p> <p>22 where Gregg Roman asked you to go on this</p> <p>23 Israel trip?</p> <p>24 MR. GOLD: Objection, asked and</p> <p>25 answered. You can answer again.</p>

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<p>1 A. I don't recall.</p> <p>2 Q. So you don't recall ever reading?</p> <p>3 You didn't read one any time recently,</p> <p>4 correct?</p> <p>5 A. No, definitely not.</p> <p>6 A VOICE: Yo, I'm in this dep,</p> <p>7 man. What is up?</p> <p>8 (Discussion off the record.)</p> <p>9 MR. CARSON: Guys, I got to</p> <p>10 take a break. Go off the record for a</p> <p>11 second. Thank you, Jason.</p> <p>12 THE VIDEO SPECIALIST: We are</p> <p>13 off the record.</p> <p>14 (Recess taken.)</p> <p>15 THE VIDEO SPECIALIST: We are</p> <p>16 back on the record.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. All right. So, sorry for that</p> <p>19 short break. When we left we were talking</p> <p>20 about the Israel trip, and I think you said</p> <p>21 that Mr. Roman asked Marnie Meyer to go on</p> <p>22 the trip; is that correct?</p> <p>23 A. I know that there was someone that</p> <p>24 was asked after me. Then, at least that's</p> <p>25 what I remember. Then, that Lisa...</p>	<p>1 MR. WALTON: Asked and</p> <p>2 answered.</p> <p>3 A. On this, on this specific trip</p> <p>4 there weren't any details. It was, there</p> <p>5 is the Israel trip, and I said I can't go</p> <p>6 on it because of my wife and the baby.</p> <p>7 That was it. But every other trip, you</p> <p>8 know, it was accommodations as normal, that</p> <p>9 I would go on.</p> <p>10 Q. What does that mean? What is</p> <p>11 normal accommodations?</p> <p>12 A. Whatever we were able to find at</p> <p>13 the last minute. If it was -- if we looked</p> <p>14 long in advance and there wasn't a problem,</p> <p>15 then wouldn't be an issue getting two rooms</p> <p>16 in the same hotel for like a normal cost.</p> <p>17 If it was a problem, we would share a room,</p> <p>18 or an Airbnb, or whatever that other thing</p> <p>19 is called that you book stays in.</p> <p>20 Q. Airbnb?</p> <p>21 A. Yeah, Airbnb.</p> <p>22 Q. Do you think it is appropriate for</p> <p>23 Gregg to share an Airbnb with another</p> <p>24 female employee on the trip to Israel?</p> <p>25 A. I guess it depended on the nature</p>
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<p>1 Q. And that someone who was asked</p> <p>2 after you was Marnie Meyer, right?</p> <p>3 A. To the best of my recollection,</p> <p>4 yes.</p> <p>5 Q. Do you know why she said no?</p> <p>6 A. I do not.</p> <p>7 Q. Do you know if she said no?</p> <p>8 MR. WALTON: Object.</p> <p>9 A. I do not.</p> <p>10 Q. Do you know whether or not she</p> <p>11 turned Gregg down because Gregg forced her,</p> <p>12 said, if you go you have to share a room</p> <p>13 with me?</p> <p>14 MR. WALTON: Objection.</p> <p>15 Assumes facts not in evidence. But go</p> <p>16 ahead.</p> <p>17 A. I definitely did not know that.</p> <p>18 And, no, I don't.</p> <p>19 Q. Did Gregg tell you that you were</p> <p>20 going to be sharing a room with him if you</p> <p>21 went on the trip?</p> <p>22 MR. WALTON: Objection.</p> <p>23 A. No.</p> <p>24 Q. Did Gregg tell you that you could</p> <p>25 have your own hotel room if you went?</p>	<p>1 of the, you know, the place.</p> <p>2 Q. What do you mean by that?</p> <p>3 A. Well, if it is a studio apartment,</p> <p>4 I guess it would be odd. If there was, if</p> <p>5 there was ample, you know, space and room</p> <p>6 for privacy, then it should be fine.</p> <p>7 Q. If there was one bathroom in the</p> <p>8 middle of the kitchen, would that be odd?</p> <p>9 A. One bathroom --</p> <p>10 MR. GOLD: Objection to form.</p> <p>11 But you can answer.</p> <p>12 A. To share a bathroom? I mean I</p> <p>13 stayed at Airbnbs with other jobs that</p> <p>14 would only be one bathroom. But I guess,</p> <p>15 no, it wouldn't be odd if that was -- you</p> <p>16 know, unless they were in the bathroom at</p> <p>17 the same time together, you know.</p> <p>18 Q. You think that's appropriate?</p> <p>19 MR. GOLD: Asked and answered.</p> <p>20 Now, come on, Seth, you are wasting time.</p> <p>21 MR. CARSON: I think your</p> <p>22 objections are wasting time, but I'm going</p> <p>23 to ask my question again.</p> <p>24 BY MR. CARSON:</p> <p>25 Q. Do you think that's appropriate?</p>

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<p>1 A. Appropriate to whom? Would my wife 2 have a problem with it? Probably. If -- 3 but many times I had to stay places and she 4 wasn't happy about it, and that's just the 5 way it is. That was the nature of -- at 6 another job I had to share, I had to share 7 a small hotel room with a 55-year-old gay 8 man, and that was -- wasn't happy about 9 that, but I had to do it because that was 10 the nature of the job, because there were 11 no other hotel rooms.</p> <p>12 So I mean, you know, it is not 13 like we are in high school here. Everybody 14 is a big kid. And if there is an 15 uncomfortable situation, then leave.</p> <p>16 Q. Did you ever share a hotel room 17 with another woman on a trip?</p> <p>18 A. Have I? No.</p> <p>19 Q. Yes. Right. So when was this trip 20 to Israel scheduled; do you remember?</p> <p>21 A. It is probably somewhere in the 22 vicinity of, my daughter was born in --</p> <p>23 Q. If I said it was around April of 24 2018, does that sound right to you?</p> <p>25 A. Yeah, that makes sense. My</p>	<p>1 Israel?</p> <p>2 A. No, I don't recall that.</p> <p>3 Q. Do you know whether he asked Lisa 4 to hide it from anyone?</p> <p>5 A. No. I would have no way to know 6 that, no.</p> <p>7 Q. When did you find out that Lisa 8 went to Israel with Gregg?</p> <p>9 A. I mean, probably just before the 10 trip, I guess.</p> <p>11 Q. You knew that they were there while 12 they were there; is that your testimony?</p> <p>13 A. At the time I had, I used time to 14 fly to California to attend the Google 15 conference. If it was at the same time -- 16 I mean, at this point I obviously know that 17 they were there. I don't remember when I 18 found out that they were there, if it 19 was -- most likely I knew before they left, 20 I would say.</p> <p>21 Q. So I know it is tough because there 22 is things you know after the fact because 23 of the case.</p> <p>24 A. Well, yes. I mean to remember when 25 I learned of it is --</p>
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<p>1 daughter was born end of February. And 2 then, yeah, yeah, in April, we were 3 pregnant, then the drama with the baby.</p> <p>4 Q. Did Gregg tell you that you 5 shouldn't tell anyone you were going to 6 Israel if you went?</p> <p>7 A. Did he tell me that I shouldn't 8 tell anyone?</p> <p>9 Q. Yeah.</p> <p>10 A. That I was going to Israel?</p> <p>11 Q. Right. When he asked you, did he 12 say: Don't tell anyone that you are going 13 to go?</p> <p>14 A. No. I told him right away that I 15 can't go.</p> <p>16 Q. Did he say: Don't tell anyone that 17 I asked you?</p> <p>18 A. I don't recall that.</p> <p>19 Q. Do you recall him trying to hide 20 the fact that he asked you in any way, from 21 anybody?</p> <p>22 MR. GOLD: Objection.</p> <p>23 A. Do I recall that he asked me what?</p> <p>24 Q. Whether he asked you to hide the 25 fact that he had invited you to go to</p>	<p>1 Q. So I'm not trying to be like, I'm 2 not trying to be aggressive or 3 argumentative right now.</p> <p>4 A. Okay.</p> <p>5 Q. I'm just trying to make that 6 distinction, if your knowledge is based 7 upon information you learned after or what 8 you knew then. So I guess my question is 9 then, like, when did you find out in 10 realtime? Was it before the trip or after 11 the trip?</p> <p>12 A. Again, I don't recall. I cannot 13 say for sure. Most likely before the trip.</p> <p>14 Q. But why do you say "most likely"?</p> <p>15 A. I was dealing with like a personal 16 drama with the baby, and I was trying to 17 use my vacation time to work a second job, 18 to make extra money. I went to the Google 19 conference in San Francisco.</p> <p>20 So whether or not I found out 21 when I came back from that conference, all 22 I can say is most likely, because I worked 23 in the office every day, and if she was 24 going, then I would say other people in the 25 office would know and it would be common</p>

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<p>1 knowledge.</p> <p>2 Q. Is that all hypothetical, or do you</p> <p>3 have knowledge that other people told you</p> <p>4 she was there?</p> <p>5 A. It is all hypothetical. I mean, it</p> <p>6 is just, we were all close, we had lunch</p> <p>7 together, we went out together. So, yeah,</p> <p>8 it is hypothetical, but it seems unlikely</p> <p>9 that I wouldn't find out until they got</p> <p>10 back.</p> <p>11 Q. Do you know who Leah Merville is?</p> <p>12 A. Yes.</p> <p>13 THE COURT REPORTER: I'm sorry?</p> <p>14 MR. CARSON: I'm sorry about</p> <p>15 that. Do you know who Leah Merville is?</p> <p>16 L-E-A-H, M-E-R-V-I-L-L-E. Leah Merville.</p> <p>17 THE COURT REPORTER: Thank you.</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Who is she?</p> <p>21 A. An intern I believe from Marseille</p> <p>22 or somewhere in France.</p> <p>23 Q. And do you know where Leah Merville</p> <p>24 was in April of 2018?</p> <p>25 A. I'm going to -- for sure, no. But</p>	<p>1 characterizing it as sexual harassment.</p> <p>2 Q. When did you first find out about</p> <p>3 Lisa's claims regarding the trip to Israel?</p> <p>4 A. She had told me that Gregg was</p> <p>5 acting like a dork on the couch probably</p> <p>6 the day she -- when we first saw each other</p> <p>7 after I came back, or she came back, over</p> <p>8 lunch, I believe it was downstairs in the</p> <p>9 cafeteria, around, close to where the</p> <p>10 office was.</p> <p>11 Q. So where were you when Lisa first</p> <p>12 told you that Gregg acted like a dork on</p> <p>13 the couch?</p> <p>14 A. I was sitting across from her at a</p> <p>15 table. I think I was eating pizza, maybe.</p> <p>16 Q. You were at a restaurant?</p> <p>17 A. In the cafeteria underneath, in the</p> <p>18 subterranean, whatever it is called there,</p> <p>19 where all the food court is, around 16th</p> <p>20 and Market.</p> <p>21 Q. And what else did she say?</p> <p>22 A. That was it, I mean. In that</p> <p>23 particular conversation, they went to a lot</p> <p>24 of meetings, then at night on the couch he</p> <p>25 was acting like a dork.</p>
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<p>1 to guess, based on, again, after-the-fact</p> <p>2 type stuff, I'm going to say Israel.</p> <p>3 Q. Okay. And you can make those</p> <p>4 distinctions any time you think it is</p> <p>5 appropriate today. So during this trip to</p> <p>6 Israel, my client has alleged that certain</p> <p>7 inappropriate conduct of a sexual nature</p> <p>8 occurred, so my question to you is: When</p> <p>9 did you find out that she was making those</p> <p>10 allegations? When did you first find out</p> <p>11 that she was making those allegations?</p> <p>12 A. As soon as --</p> <p>13 MR. WALTON: Seth, objection.</p> <p>14 Wait, Matt. Seth, can you be more specific</p> <p>15 about, can you be more specific about what</p> <p>16 you mean by the allegations?</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Sure. When did you first find out</p> <p>19 that Lisa Barbounis had claimed to have</p> <p>20 experienced sexual misconduct during the</p> <p>21 trip to Israel by Gregg Roman?</p> <p>22 MR. GOLD: Objection. Assumes</p> <p>23 facts not in evidence. Also, there is a</p> <p>24 conclusion of law. Why don't you ask him</p> <p>25 what facts he knows rather than</p>	<p>1 Q. Who told you to say that?</p> <p>2 A. I remember the word, "dork."</p> <p>3 Q. Who told you to say that?</p> <p>4 A. Who told me to say that?</p> <p>5 MR. WALTON: Wait a second.</p> <p>6 Stop. Objection. Who told him to say</p> <p>7 what?</p> <p>8 Q. Who told you to say that, that my</p> <p>9 client told you that Gregg acted like a</p> <p>10 dork?</p> <p>11 MR. WALTON: Nobody told him to</p> <p>12 say it.</p> <p>13 Q. Who directed you to say that?</p> <p>14 A. Come on. Who --</p> <p>15 MR. WALTON: Don't answer that.</p> <p>16 MR. CARSON: You can answer it.</p> <p>17 MR. WALTON: No, it is not.</p> <p>18 That's, that's accusing him of fraud.</p> <p>19 MR. CARSON: I am accusing him</p> <p>20 of fraud.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. You are lying right now, aren't</p> <p>23 you?</p> <p>24 MR. WALTON: Objection. Don't</p> <p>25 answer that.</p>

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<p>1 A. Definitely not. Lisa and I had 2 lunch downstairs, underneath the office, in 3 the cafeteria. We talked about the trip. 4 She said: Gregg was acting like a dork on 5 the couch. 6 Q. Is that funny that she said that? 7 A. No. It is funny that you are 8 insinuating -- 9 MR. WALTON: It is funny that 10 you are accusing him of lying. 11 MR. CARSON: Dave, if you are 12 not going to get sworn in you need to stop 13 and just enter your objection. 14 MR. WALTON: No. You need to 15 stop your argumentative and abusive 16 questions. 17 BY MR. CARSON: 18 Q. I'm going to continue my 19 examination. So did she tell you that she 20 slept with a knife under her pillow? 21 A. No, she did not tell me that. I 22 saw text messages, I saw screen shots that 23 were e-mailed to me, I believe, that she 24 had sent to someone else, and then deleted, 25 but the other person saved them. I believe</p>	<p>1 Roman graphically explained how he had sex 2 with Leah Merville? 3 A. I remember talking about that. Not 4 me and her. I remember there was talking 5 about that. But in that conversation when 6 I first learned that whatever took place on 7 a couch that you are describing now, no, in 8 that conversation, there was no mention of 9 that. 10 Q. When did you first learn that Gregg 11 Roman had sex with Leah Merville? 12 A. I believe it was probably at AIPAC, 13 Marnie said Gregg had told her that, or 14 Marnie said that it had happened, or there 15 was a rumor that it had happened. 16 I mean, you are asking me to 17 remember something that I have heard of 18 after the fact, and then when I heard it 19 the first time. So to the best of -- 20 Q. Did Gregg -- 21 A. Sorry. 22 Q. Did Gregg ever tell you he had sex 23 with Leah Merville? 24 A. No. He told me he had met Leah 25 Merville to give her a paper, in Israel,</p>
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<p>1 it was Tricia. And I guess Tricia gave her 2 back the screen shots of the messages, 3 which I saw, which said that thing about 4 the knife under the pillow. 5 Q. Those text messages were sent in 6 realtime, right? 7 A. I would -- 8 Q. While she was in Israel? 9 A. Again, I was showed screen shots of 10 messages that were apparently sent and 11 deleted, that I never -- I don't know what 12 was time stamped or whatever. I assume 13 that they were in Israel. That's what the 14 logical assumption is, is that she was 15 texting them in realtime. 16 Q. Did Lisa Barbounis tell you that 17 Gregg told her that he needed release and 18 suggested that she give him a blow job? 19 A. No, definitely didn't, wasn't 20 graphic in that, in that depiction or 21 description. She said he was acting -- she 22 said something like he said he was very 23 stressed, but she didn't say that he had 24 asked her to give him a blow job, no. 25 Q. Okay. Did she tell you that Gregg</p>	<p>1 because she was there and she needed a 2 paper. 3 And then later when I found out 4 that this was, you know, I guess being said 5 about him, I was worried or nervous that if 6 that did happen, and I was the one who, you 7 know, brought her, my name was on her 8 internship papers, whatever, I became angry 9 at Gregg, for, if that happened, having put 10 me in the situation. Or like -- 11 Q. What is this paper that you were 12 testifying about? What was that? 13 A. I think it was a document that she 14 needed about, to complete her internship or 15 something. I don't know. 16 Q. So who told you about that paper? 17 A. I believe, I'm not sure if -- who 18 was still working in the office. But 19 whoever was coordinating after the 20 follow-up of her internship said that there 21 was some document, depending on what time 22 it was, it could have been Eman Patel who 23 was corresponding with -- whoever was 24 corresponding with all the intern people at 25 the time then informed me there is a</p>

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<p>1 document, there is a thing needed to be 2 filled out and signed and returned to her 3 for internship. 4 Q. So what does that have to do with 5 Gregg Roman having sex with her? 6 A. I didn't say it had anything to do 7 with that. 8 Q. When I asked you about Gregg Roman 9 having sex with her, you brought up a piece 10 of paper. So do you have any knowledge of 11 the way that the piece of paper that she 12 needed signed related to a sexual encounter 13 between them? 14 A. Well, the allegation is or the 15 story is, is that, that, yes, that happened 16 when she came to get the paper. 17 Q. Is that appropriate? 18 A VOICE: It didn't happen. 19 A. Is what appropriate? 20 MR. CARSON: Who just said 21 that? 22 THE WITNESS: Making the 23 allegation? 24 MR. CARSON: Who just said, "It 25 didn't happen"?</p>	<p>1 the record that the defendant in this case 2 is going on the record and instructing the 3 witness what to say. 4 MR. WALTON: No, he is not, he 5 didn't instruct the witness. If that was 6 Gregg, there was no instruction to the 7 witness for what the witness to say. 8 MR. CARSON: So we are going to 9 put Gregg Roman down next to the person who 10 said, "It didn't happen," okay? That's how 11 we are going to record that. 12 MR. GOLD: That's not okay. 13 MR. CARSON: Well, who said it? 14 Did you say it, Sidney? We can ask 15 everyone who is on this call right or else 16 I'm going to call Judge Wolson. 17 MR. GOLD: I'll take a voice 18 test. It is not me. 19 MR. CARSON: I'm calling the 20 judge. That's fine. 21 MR. WALTON: Let's go off the 22 record. 23 MR. CARSON: That's fine. We 24 will just call the judge and ask him. 25 MR. WALTON: Let's go off the</p>
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<p>1 Who just said, "It didn't 2 happen"? The court reporter needs to 3 record their voice, who has made that 4 statement. So we are going to wait while 5 we figure that out right now. 6 Is anyone going to say who said 7 that? 8 I'm going to ask the court 9 reporter, you just recorded someone saying, 10 "It didn't happen," correct? 11 THE COURT REPORTER: I reported 12 that as "a voice" because I didn't know who 13 it was. 14 MR. CARSON: Yeah. So the 15 person who said that needs to make 16 themselves known right now. 17 I guess I'll give you guys like 18 another two minutes or I'm going to call 19 the Court. 20 MR. WALTON: Go ahead and call 21 the Court, I guess. 22 MR. CARSON: I am going to call 23 the Court. Because Gregg Roman just said 24 that, and that's totally inappropriate. 25 And the court reporter needs to put down on</p>	<p>1 record and see if we can resolve it, Seth. 2 MR. CARSON: What is there to 3 resolve? We are going to either properly 4 record the person who made the statement on 5 the record, or we are not. 6 MR. WALTON: Seth, I asked you 7 if we could go off the record. 8 MR. CARSON: We can go off the 9 record. 10 THE VIDEO SPECIALIST: We are 11 off the record. 12 (Discussion off the record.) 13 MR. CARSON: We are going to 14 properly identify Gregg Roman as the person 15 who made that statement, correct? 16 MR. WALTON: Correct. 17 MR. GOLD: Gregg -- 18 THE COURT REPORTER: Counsel. 19 MR. GOLD: This is Mr. Gold. I 20 represent Mr. Roman. Mr. Roman thought he 21 was on mute. That was his voice we heard 22 on the record saying, "I didn't do it," or 23 whatever the comment was, and we can 24 attribute it to Mr. Roman on the record. 25 MR. CARSON: Sure. Now, there</p>

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<p>1 is two people telling lies for Gregg today. 2 MR. GOLD: So -- 3 MR. WALTON: What? 4 MR. CARSON: Two people. It is 5 okay. I'll continue my examination. 6 MR. WALTON: No, no, no. Wait, 7 wait a second. Wait a second. Did you 8 just accuse Sid of lying? 9 MR. CARSON: Yes, I did. 10 MR. WALTON: So you -- 11 MR. GOLD: Now what -- 12 THE COURT REPORTER: Excuse me. 13 I'm having trouble because multiple people 14 are talking. 15 MR. GOLD: What is the lie you 16 are accusing me of? 17 MR. CARSON: He didn't think 18 his phone was on mute. That's nonsense. 19 MR. GOLD: Are you a mind 20 reader? 21 MR. CARSON: Nonsense. 22 MR. GOLD: Reading people's 23 minds will get far in this case. 24 MR. CARSON: I'm sure telling 25 lies that have no credibility is going to</p>	<p>1 not in evidence, misleading question. 2 MR. CARSON: Correct? 3 MR. GOLD: Rephrase the 4 question. I'm not going to allow him to 5 answer that question. Now you can call the 6 Court. 7 And save that question, Ms. 8 Stenographer. We are going to read that 9 back to the judge. 10 MR. CARSON: Your objection is 11 noted, correct? 12 MR. GOLD: I direct you not to 13 answer the question. 14 MR. CARSON: You can't direct 15 him. 16 MR. GOLD: I already said, read 17 the question back, because the question is 18 not stated, you said -- 19 MR. CARSON: That's not a valid 20 reason to tell someone not to answer the 21 question. 22 MR. GOLD: Can I hear the 23 question again. 24 (The record was read back: 25 Q. So you were testifying</p>
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<p>1 get you guys far. 2 MR. GOLD: Watch your 3 commentary because I will report that to 4 the Court. 5 MR. CARSON: You do what you 6 got to do. 7 MR. GOLD: I'll do what I have 8 to do. Go ahead. You've had enough 9 sanctions asserted against you already in 10 this case. Go ahead. Let's go. 11 MR. CARSON: It doesn't bother 12 me. You can keep asserting -- 13 MR. GOLD: Oh, it doesn't. Go 14 ahead. 15 MR. CARSON: Keep asserting 16 privilege sanctions against me until you 17 guys are blue in the face. That's fine. 18 I'm going to continue now. 19 BY MR. CARSON: 20 Q. Okay. So you were testifying about 21 Gregg Roman luring Leah Merville to a hotel 22 room by using a piece of paper that she 23 needed signed to have sex with her? 24 MR. GOLD: Objection. Direct 25 the witness not to answer. Assumes facts</p>	<p>1 about Gregg Roman luring Leah Merville to a 2 hotel room by using a piece of paper that 3 she needed to have signed to have sex with 4 her?) 5 MR. GOLD: I direct you not to 6 answer the question. Misstates his 7 testimony. 8 BY MR. CARSON: 9 Q. Is that correct? Is that what you 10 were testifying about? 11 A. No. 12 Q. So explain how the piece of paper 13 that Leah Merville needed to have signed 14 relates to Gregg Roman and her sexual 15 encounter. 16 A. I was not in Israel in April. I do 17 not know if, or if a paper was ever given 18 to Leah or what -- I know that at some 19 point she needed something after her 20 internship, and that's it. And there was a 21 rumor that he had -- that someone, I 22 believe, else started that, that that had 23 taken place or that something had taken 24 place. 25 Again, I have no knowledge if</p>

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<p>1 something had taken place. I didn't 2 witness anything. Leah never told me 3 anything. I never saw a piece of paper. 4 I'm telling you what was common knowledge 5 in the office at the time that I left the 6 office and between the time that all of 7 this chaos broke out. 8 Q. When did it become common knowledge 9 in the office? 10 A. It could have been at some point 11 around the holiday party when we were all 12 drinking and Marnie was asking me, imagine 13 Gregg's dick in Leah's mouth, over and over 14 again. 15 Q. What year? What holiday party? 16 When was this? 17 A. The last one that I attended in, 18 whatever it was, the end of 2018. 19 Q. Didn't you testify that you had a 20 conversation with Marnie Meyer about it 21 during the AIPAC conference in March of 22 2018? 23 A. She told me that, she told me that 24 then. She said, Did you know Leah needed a 25 paper, or something like that. And I said,</p>	<p>1 I was asked to meet at a 2 Starbucks, on the way to work I got a text 3 message, come meet us here. And then I get 4 to the Starbucks, Marnie and Lisa are 5 there. They said: We told Daniel 6 everything, and we just want, and we want 7 you to know so you know what you are 8 walking into. 9 And I said: "What is 10 everything? What do you mean?" 11 And she showed me on her phone, 12 which was like about this big (indicating), 13 of a picture of a letter that looks like 14 was sent. I don't know if the actual 15 letter was sent. Whatever. But I saw the 16 picture. 17 I said: "I can't read this. 18 Tell me, like tell me what is going on." 19 And the implication was that I was 20 mentioned in it or that they made me look 21 guilty in some way to Daniel, that I had 22 done something or not done something. 23 I think the words "you are with 24 us or against us," or something like that, 25 were said to me, because that, I was</p>
Page 76	Page 78
<p>1 "Yes." And then she told me that Gregg 2 told her or she said that Gregg told her 3 that. 4 Q. And then Lisa told you about it 5 too, correct? 6 A. Lisa told me that about Leah? 7 Q. Right. 8 A. I don't recall Lisa being the one 9 to inform me of that. But I believe -- 10 Q. Go ahead. You can finish. 11 A. I believe it was, I believe it was 12 at AIPAC, I believe Marnie told me that at 13 AIPAC. And I was almost like surprised 14 that I wouldn't know if that happened, if 15 it did happen, that's why I remember her 16 telling me there. 17 Q. Were you concerned after you found 18 this out? 19 A. Not in the moment. But as months 20 went by, then, or at the time that -- no, I 21 was concerned when, when I was shown a 22 screen shot of a yellow paper that was 23 apparently sent to Daniel, and told we -- 24 you are in this, and you're -- you know, we 25 are just giving you a heads-up.</p>	<p>1 rattled going into the office that day. 2 And that was when my concern began of 3 whatever this, of this story, of this 4 whatever. 5 Q. You are testifying that your 6 concern into what began at that time? 7 A. My concern was that there was 8 something that was said to me, to my boss, 9 or about me to my boss that I didn't know 10 what it was, me knowing that I'm not guilty 11 of anything. 12 I even said on the spot: I 13 think my work will speak for itself. I'm 14 good at what I do. I didn't do anything 15 wrong, so I don't know why you are telling 16 me that you wrote a letter and put my name 17 in it, and then gave it all to a person, 18 like, the implication was you might get 19 fired now. 20 Q. Didn't you have a conversation with 21 Lisa and Tricia in your office about it? 22 A. About Leah Merville? 23 Q. Yes. 24 A. No, I don't, I don't recall a 25 conversation about Leah Merville, no.</p>

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<p>1 Q. So you might have had a</p> <p>2 conversation in your office about it; is</p> <p>3 that correct?</p> <p>4 A. I said I don't recall a</p> <p>5 conversation about Leah Merville in my</p> <p>6 office.</p> <p>7 Q. Tricia sat in the chair, Lisa was</p> <p>8 on the floor, and they were talking to you</p> <p>9 about what happened in Israel, correct?</p> <p>10 A. Incorrect. I don't remember --</p> <p>11 about -- no, I don't.</p> <p>12 Q. About Gregg Roman sexually</p> <p>13 harassing female employees at the Middle</p> <p>14 East Forum, correct? You had a</p> <p>15 conversation about that in your office?</p> <p>16 A. No. If a conversation was ever</p> <p>17 brought to me in that regard, or somebody</p> <p>18 had a legitimate gripe, I would have done</p> <p>19 the same thing I did when Tiffany Lee was</p> <p>20 destroying the organization, and I would</p> <p>21 have said: Put it in writing and e-mail it</p> <p>22 to me, so that I had proof, so that I</p> <p>23 wouldn't be responsible.</p> <p>24 My biggest fear was losing my</p> <p>25 job, not being able to pay the mortgage and</p>	<p>1 Catriona, then make it known now, or</p> <p>2 something like that, or at least it is the</p> <p>3 best I can remember of saying something</p> <p>4 like that.</p> <p>5 The point is, is that I'm not</p> <p>6 an idiot. If someone was going to make a</p> <p>7 complaint, and then I'm not going to report</p> <p>8 it, then obviously I did something wrong.</p> <p>9 If I'm going to make a complaint, my</p> <p>10 natural response to anything would have</p> <p>11 been, put it in writing, just like I did</p> <p>12 with Tiffany Lee, just like I did with Lara</p> <p>13 and Laura when they demonstrated</p> <p>14 incompetency in performing their tasks. I</p> <p>15 said: Send me the e-mail, send me the</p> <p>16 e-mail, send me the e-mail, put it in</p> <p>17 writing.</p> <p>18 Q. When Lara and Laura accused Gregg</p> <p>19 Roman of sexual harassment, you told them</p> <p>20 to put it in writing?</p> <p>21 A. They never said anything to me</p> <p>22 about sexual harassment or anything about</p> <p>23 Gregg Roman.</p> <p>24 Q. They never told you that Gregg</p> <p>25 Roman was inappropriate with them?</p>
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<p>1 support the family that I had just begun</p> <p>2 creating. If I was at any point having had</p> <p>3 to sign a document that said I would know</p> <p>4 of some, as a manager or supervisor, and</p> <p>5 someone said I have a claim that I am, I</p> <p>6 feel this way or I want to do something, I</p> <p>7 would have said: Put it in writing, we</p> <p>8 will take, you know, logical course of</p> <p>9 action.</p> <p>10 Q. You told Lisa McNulty -- sorry --</p> <p>11 Lisa Barbounis and Patricia McNulty that,</p> <p>12 you told them that you were worried about</p> <p>13 Catriona coming on full-time with Gregg</p> <p>14 Roman in the office, correct?</p> <p>15 A. At some point -- no, I didn't say I</p> <p>16 was worried about Catriona coming on. I</p> <p>17 said at some point, they were talking about</p> <p>18 -- I don't know if they were talking about</p> <p>19 who one of them was sleeping with or</p> <p>20 something, but when the -- it was like,</p> <p>21 more like gossip talk than anything, like</p> <p>22 what, all the drama that was going on or</p> <p>23 all the -- everybody's personal business.</p> <p>24 And I said, if there is a</p> <p>25 problem with Gregg, then before I hire</p>	<p>1 A. Definitely not. Definitely not.</p> <p>2 Lara and Laura?</p> <p>3 Q. Yes.</p> <p>4 A. Definitely not.</p> <p>5 Q. Yeah. Isn't that why they got</p> <p>6 fired, is because they were talking about</p> <p>7 Gregg Roman's sexually inappropriate</p> <p>8 behavior, and Gregg Roman found out about</p> <p>9 it and made sure that they were fired?</p> <p>10 MR. GOLD: Objection. Assumes</p> <p>11 facts not in evidence. Nobody was fired.</p> <p>12 What are you talking about?</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Isn't that why they were fired?</p> <p>15 A. I don't know if they were -- I</p> <p>16 don't know if anybody was fired, or</p> <p>17 anybody, what agreements anybody had, if</p> <p>18 they left or if they resigned, except for</p> <p>19 myself, I know that I resigned.</p> <p>20 Lara was, demonstrated that she</p> <p>21 was incompetent or unable to handle the</p> <p>22 workload of all the travel, the domestic</p> <p>23 travel. For that reason Catriona, who was</p> <p>24 an intern, assisted me in organizing dozens</p> <p>25 and hundreds of meetings. Before Lisa and</p>

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<p>1 Tricia were ever hired, Catriona, as an 2 intern, was better able to do Lara's job 3 than Lara was, as someone with a master's 4 degree and an interest in Middle East 5 foreign policy. 6 So when Lara demonstrated her 7 inability to carry out her tasks, I asked 8 to hire Catriona to help with, instead, 9 that maybe we should bring on Catriona. 10 I don't know, I don't think 11 that's the reason that Lara left, because I 12 asked or that I said Catriona will be able 13 to carry out the responsibility of a 14 development associate. But it was very 15 clear that she couldn't. And so Lara's 16 workload fell on my desk, the same way that 17 Laura's workload fell on my desk. She 18 misspelled the names of universities. She 19 misspelled things in news releases that 20 would go out. And Daniel would say: Why 21 would there be these stupid mistakes in 22 publications being sent out? And then I 23 would have to double check and reread 24 everything that she was doing, or made sure 25 that work was being carried out.</p>	<p>1 alright, I got to go to Marnie because 2 that's the HR person. 3 Q. In fact, you did try to talk Lisa 4 into reporting the sexual harassment to 5 Daniel Pipes, correct? 6 A. You cut out for a second. What was 7 the question? 8 Q. In fact, you did try to talk Lisa 9 into reporting sexual harassment to Daniel 10 Pipes, right, Gregg's sexual harassment? 11 A. I don't remember doing that, but if 12 it occurred, it would have been at a point 13 where I started to hear that Delaney 14 brought pepper spray to a meeting, and 15 everybody was suddenly afraid of Gregg, 16 that he was large, intimidating. And then 17 saying, well, you have these gripes, then, 18 fine. 19 After Marnie said, "I'll never 20 trust you again," and Lisa called me a 21 pussy to my face, right in the middle of 22 Tir na nOg at 16th and Arch, and I realize 23 I no longer had the support or friendship 24 of anybody in the office, I was left with 25 one alternative, it was either rise up and</p>
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<p>1 So the challenge was not to 2 have that work fall on my desk. And it did 3 for both of them. And that prevents me to 4 promote the mission of the organization, 5 raise money, organize more events, 6 etcetera, etcetera. 7 So, no, neither of them 8 certainly ever told me that Gregg was 9 sexually inappropriate with them. 10 Q. How many women told you that Gregg 11 was sexually inappropriate with them during 12 your employment with the Middle East Forum? 13 A. None. None. 14 Q. Not one? 15 A. No. At some point Tricia said 16 something happened at AIPAC, and then Lisa 17 said something happened in Israel. And all 18 I had was -- and I remember saying to 19 Tricia, who I thought was close to a 20 friend: Well, why wouldn't you tell me 21 that? I had no idea. She didn't. 22 Lisa at the time didn't come 23 back from Israel and say I was sexually 24 assaulted, I was sexually harassed. If she 25 had done it, I would have said, like,</p>	<p>1 take Gregg out, which she obviously wanted 2 me to do at the November 5th meeting, or 3 start looking for another job. 4 And I did both at the same 5 time, and I found another job before, 6 first, and things took their natural 7 conclusion. 8 Q. When did you start looking for 9 another job? 10 A. Probably, I could look up when I 11 started sending resumes and stuff, it was 12 probably -- well, it could have been after 13 I realized that, that none of them were 14 actually my friends or that I had none of 15 their respect, they didn't really want me 16 to be their manager or leader. 17 Q. When was that? 18 A. It increased between November 2018 19 and the time that I left in March. 20 Q. So it is your testimony that when 21 you were confronted with all these reports 22 of sexual harassment, you had two choices, 23 either take Gregg Roman out or get another 24 job; is that your testimony? 25 A. I wasn't confronted with any</p>

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<p>1 reports of sexual harassment. Again, no 2 one -- 3 Q. Ever? 4 A. -- said Gregg harassed me, no. No 5 one said Gregg harassed me or I feel 6 uncomfortable. And if they did, I would 7 have said: Let's write something about it, 8 or why didn't you come to me sooner. 9 It was like either months later 10 or, or one day it was suddenly something 11 that was like traumatic. 12 On one hand it was, well, 13 nothing happened, it wasn't a big deal. 14 And then later on, it was a big deal. 15 Everyone was saying it. 16 Q. Did Gregg Roman offer you money for 17 your testimony today? 18 A. That's absurd. 19 Q. Well, it is not absurd since there 20 is evidence that -- 21 A. No, no. 22 Q. -- that -- 23 A. No, no, he did not. No, he did 24 not. 25 MR. GOLD: Objection.</p>	<p>1 accuse Gregg of sexual harassment or 2 sexually inappropriate conduct of any sort? 3 MR. WALTON: This is Dave 4 Walton. 5 THE WITNESS: If I received -- 6 MR. WALTON: Wait, Matt. Wait, 7 Matt. 8 MR. CARSON: Mr. Walton is 9 going to say: Objection, asked and 10 answered. And then you can answer. 11 MR. WALTON: No, Seth, please 12 let me state my objection. I'm trying to 13 do it slow for the court reporter. Okay. 14 MR. CARSON: Go ahead. 15 MR. WALTON: Seth, you keep 16 badgering the witness. His -- 17 MR. CARSON: His last answer 18 was not responsive. 19 MR. WALTON: Please let me 20 finish, Seth. Please let me finish. His 21 last answer was not nonresponsive. You 22 just don't like the answer. 23 MR. CARSON: No, I'm fine with 24 the answer. 25 MR. WALTON: I said objection</p>
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<p>1 Objection, again argumentative, states 2 facts not in evidence. 3 Q. Okay. So I'll ask this one more 4 time and then I won't ask it again. In 5 your entire career at the Middle East 6 Forum, from the first day of your 7 employment to the last day of your 8 employment, has any woman ever complained 9 that Gregg Roman was sexually inappropriate 10 to you? 11 MR. WALTON: This is Dave 12 Walton. Objection, asked and answered. 13 You can answer again. 14 Q. Yes or no? 15 A. If anyone would have come to me at 16 any point, man or woman, and said Gregg was 17 sexually inappropriate to me, my answer 18 would have been: Write it in an official 19 e-mail so that we could carry things out to 20 the natural conclusion. 21 Q. Nonresponsive. 22 I'm asking you a simple yes or 23 no question. From the first day of your 24 employment to the last day of your 25 employment, have you ever heard any woman</p>	<p>1 for -- 2 MR. CARSON: It is 3 nonresponsive. 4 MR. WALTON: If you were fine 5 with the answer you wouldn't be acting like 6 this. Just let me finish my objection. 7 MR. CARSON: No, Mr. Walton, 8 his answer was if someone would have come 9 to me, this is what I would have done. I 10 didn't ask if someone would have come to 11 you, what would you done. I said: Did 12 anyone ever come to you? So his answer was 13 nonresponsive. We are going to be here -- 14 MR. WALTON: He gave responses. 15 His answer was not nonresponsive. He 16 answered the question 20 different times, 17 and you keep trying to get him to answer it 18 in a different way. 19 MR. CARSON: I just want him to 20 state no so we can move on. 21 MR. WALTON: I'm going to place 22 my objection. I'm going to place my 23 objection to asked and answered numerous 24 times. 25 MR. CARSON: Got it.</p>

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<p>1 MR. WALTON: He can answer</p> <p>2 subject to the objection.</p> <p>3 MR. CARSON: Mr. Walton, don't</p> <p>4 you think your objection is a little</p> <p>5 long-winded right now? Is it appropriate</p> <p>6 for you to take five minutes to make a</p> <p>7 simple objection, asked and answered. Five</p> <p>8 minutes.</p> <p>9 MR. WALTON: Well, Seth, it</p> <p>10 wouldn't have taken five minutes if you</p> <p>11 didn't interrupt me 20 times.</p> <p>12 MR. CARSON: All you got to do</p> <p>13 is say: Objection, asked and answered.</p> <p>14 You don't have to say --</p> <p>15 MR. WALTON: Ah --</p> <p>16 THE COURT REPORTER: Counsel,</p> <p>17 counsel, excuse me. I can't report you</p> <p>18 both at once.</p> <p>19 MR. WALTON: Okay. Seth --</p> <p>20 MR. CARSON: So we are not</p> <p>21 going to do speaking objections today.</p> <p>22 That's not going to happen.</p> <p>23 MR. WALTON: Seth. Seth.</p> <p>24 Seth, you are --</p> <p>25 MR. CARSON: Are you going to</p>	<p>1 MR. CARSON: That's all you are</p> <p>2 doing. You are just blabbering on the</p> <p>3 record. Like I don't need --</p> <p>4 MR. WALTON: Stop calling</p> <p>5 people --</p> <p>6 MR. CARSON. -- that on the</p> <p>7 record. You don't need to sit and explain</p> <p>8 what your client -- like, you have a right</p> <p>9 to make objections today. Your objections</p> <p>10 need to be short and concise. Anything</p> <p>11 else you say on the record is</p> <p>12 inappropriate. And therefore --</p> <p>13 MR. WALTON: Seth --</p> <p>14 MR. CARSON: -- telling me that</p> <p>15 I -- telling me that we should take a</p> <p>16 break. Like, stop, just stop.</p> <p>17 MR. WALTON: Seth, Seth, you</p> <p>18 stop. Please, please --</p> <p>19 MR. CARSON: Are you done now?</p> <p>20 MR. WALTON: No, I'm not done.</p> <p>21 I'm not done.</p> <p>22 MR. CARSON: I'll wait for you</p> <p>23 to be done. Go ahead.</p> <p>24 MR. WALTON: Well, then, are</p> <p>25 you going to interrupt me again or are you</p>
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<p>1 say -- if you have another objection to</p> <p>2 make, make it. If not, I don't need to</p> <p>3 hear anything else from you guys.</p> <p>4 MR. WALTON: Seth, I will say</p> <p>5 whatever I want on the record.</p> <p>6 MR. CARSON: You will not.</p> <p>7 MR. WALTON: You are being</p> <p>8 abusive. You are out of control right now.</p> <p>9 I suggest that you take a break.</p> <p>10 MR. CARSON: We are not going</p> <p>11 to take a break.</p> <p>12 MR. WALTON: Take a deep</p> <p>13 breath. And then come back. Because you</p> <p>14 are out of control.</p> <p>15 MR. CARSON: We are not taking</p> <p>16 a break.</p> <p>17 MR. WALTON: Just relax.</p> <p>18 Finish the deposition. Stop lobbing</p> <p>19 accusations at me. Stop lobbing</p> <p>20 accusations at your --</p> <p>21 MR. CARSON: Dave, you are just</p> <p>22 wasting time. You are just speaking for</p> <p>23 the record.</p> <p>24 MR. WALTON: Stop calling</p> <p>25 people --</p>	<p>1 going to let me finish?</p> <p>2 MR. CARSON: I mean, are you</p> <p>3 going to make another nonsensical, totally</p> <p>4 inappropriate, speaking objection?</p> <p>5 MR. WALTON: You are completely</p> <p>6 out of control right now. I'm going to ask</p> <p>7 you to tone it down, be civil, stop</p> <p>8 accusing people of lying, so we can go</p> <p>9 forward with this deposition.</p> <p>10 This is completely</p> <p>11 inappropriate, the way you are acting.</p> <p>12 MR. CARSON: I agree that there</p> <p>13 is something very inappropriate.</p> <p>14 MR. WALTON: Now, you can, now,</p> <p>15 Mr. Bennett, you can answer the question</p> <p>16 for the umpteenth time. Objection, asked</p> <p>17 and answered.</p> <p>18 MR. CARSON: Right. How long</p> <p>19 did that take Mr. Walton to do? What was</p> <p>20 that? Five minutes?</p> <p>21 MR. WALTON: Seth, you are the</p> <p>22 one who is --</p> <p>23 MR. CARSON: What was that?</p> <p>24 Five minutes?</p> <p>25 MR. WALTON: Seth, you are the</p>

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<p>1 one who is continuing this with these 2 snarky comments. And you interrupted me, 3 you've interrupted me fifty different 4 times. 5 MR. CARSON: Okay. Here we go 6 again. 7 MR. WALTON: And your behavior 8 right now is sophomoric and juvenile. Now, 9 knock it off. 10 MR. CARSON: Take your time. 11 Anything else you need to say? 12 MR. WALTON: Go ahead. 13 MR. CARSON: Is there anything 14 else you would like to put on the record, 15 Mr. Walton? 16 MR. WALTON: Every time I say 17 I'm done then you come back with a snarky 18 comment. I'm done. 19 MR. CARSON: Okay. 20 MR. WALTON: I told him he can 21 answer the question. 22 BY MR. CARSON: 23 Q. What is your answer? 24 A. Frankly, I don't remember what the 25 question was, but the whole line of</p>	<p>1 Q. Wasn't that doing something about 2 it? 3 A. Well, doing something about it is 4 taking action. Action would be reporting. 5 I'm not sure if it is taking action. 6 Whatever you want to say. 7 But if someone comes to me and 8 said, Matt, I have a complaint to make, no. 9 No one ever came to me and said, Matt, I 10 would like to make a complaint. Zero 11 times. Not one person. Never. 12 Q. Is it your testimony that -- 13 A. Everything that I know was either 14 told to me after it happened by someone 15 else that was making the accusations. I 16 never saw anything firsthand, no. Like 17 over and over again, a resounding no. 18 Q. Did you tell your wife about it? 19 A. About what? 20 Q. Gregg Roman's sexual harassment? 21 MR. WALTON: Objection to form. 22 A. I don't know. I don't understand 23 the question. 24 Q. Did you ever tell your wife about 25 all the women in the office who reported</p>
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<p>1 questioning -- 2 Q. I asked if any woman, from the 3 first day of your employment to the last 4 day of your employment, ever reported 5 sexual misconduct with regard to Gregg 6 Roman, ever? 7 A. Define "reported." 8 Q. Told you about. 9 A. No, no. Was it mentioned in 10 passing in a casual way, amongst other 11 people? Yes. 12 Did I ask: Is this something 13 that is serious? No. It was either, 14 either it happened months ago, or some 15 screen shots of it. 16 If anyone had come to me, my 17 natural response would have been: Put it 18 in writing. 19 Q. Yeah. You would have done 20 something about it, right? 21 A. Well, I wouldn't have done 22 something about it. I don't know what 23 authority I have. I would have passed it 24 on to HR, or Daniel, or in-house counsel, 25 or whatever.</p>	<p>1 sexual harassment? 2 MR. WALTON: Objection to form 3 and that misstates his testimony. You can 4 answer. 5 A. First of all, I don't know whether 6 spousal privilege applies here. But she 7 knew that there was drama breaking out at 8 the office, and she said -- and she 9 didn't-- 10 MR. GOLD: Objection. I'm 11 going to direct you not to mention any 12 conversations you had with your wife. 13 Okay. 14 Q. Yeah, except for the ones that were 15 waived because he told other people about 16 them, those ones you have to testify about. 17 Did your wife tell you she was extremely 18 disappointed in you for the way you handled 19 it? 20 MR. GOLD: The better question 21 is: What did you tell other people about 22 what your wife told you. 23 Q. Thank you for the advice. I can go 24 with Sidney's question. What did you tell 25 other people about what your wife told you?</p>

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<p>1 A. I don't, I don't recall.</p> <p>2 Q. Okay.</p> <p>3 A. But it sounds like you know, so, I</p> <p>4 mean, you could tell me and ask me if I</p> <p>5 remember, but I don't recall.</p> <p>6 Q. Did your wife ever express</p> <p>7 disappointment in you for the way you</p> <p>8 handled the entire situation with regard to</p> <p>9 the women at MEF who were subjected to</p> <p>10 sexual harassment?</p> <p>11 MR. GOLD: Objection. I direct</p> <p>12 you not to answer. It is a matter of</p> <p>13 privilege.</p> <p>14 MR. CARSON: It is not a matter</p> <p>15 of privilege.</p> <p>16 MR. GOLD: You asked: What did</p> <p>17 you tell your wife.</p> <p>18 MR. WALTON: Seth, I think you</p> <p>19 need to ask him, did you ever tell anybody</p> <p>20 that your wife said X, Y, Z, that's the way</p> <p>21 you need to ask it.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. I mean, I'll get to the exhibit in</p> <p>24 a minute. But my question is: Were you</p> <p>25 ever --</p>	<p>1 that, yes, she was disappointed in me or</p> <p>2 that I was disappointed. I don't recall.</p> <p>3 I don't recall. But if you had that</p> <p>4 exhibit, just let's get it over with.</p> <p>5 Q. We will get to the exhibits in a</p> <p>6 moment.</p> <p>7 A. Okay.</p> <p>8 Q. You were ashamed of yourself for</p> <p>9 the way you handled all these women's</p> <p>10 reports, correct?</p> <p>11 A. Again, I never received any reports</p> <p>12 of anything.</p> <p>13 Q. So why were you ashamed?</p> <p>14 A. No one said: I have a report. No</p> <p>15 one said: I have a complaint. No one</p> <p>16 said: I have -- I want to do something</p> <p>17 about something.</p> <p>18 Q. So is it your testimony that a</p> <p>19 female needs to use certain magic words in</p> <p>20 order to report discrimination or</p> <p>21 harassment in the workplace?</p> <p>22 MR. GOLD: He is not going to</p> <p>23 respond to --</p> <p>24 A. No. There is a handbook that says,</p> <p>25 if you have a complaint, this is the way to</p>
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<p>1 MR. WALTON: Your sound cut</p> <p>2 out.</p> <p>3 THE COURT REPORTER: Can't hear</p> <p>4 you. Cannot hear you.</p> <p>5 THE WITNESS: Oh, not just me.</p> <p>6 MR. WALTON: Seth.</p> <p>7 THE VIDEO SPECIALIST: Seth, we</p> <p>8 lost you.</p> <p>9 MR. CARSON: Hello? Can you</p> <p>10 hear me now?</p> <p>11 MR. WALTON: Yes. Seth, can</p> <p>12 you hear us?</p> <p>13 MR. CARSON: Yep, I can hear</p> <p>14 you guys.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Did you ever express disappointment</p> <p>17 in yourself for the way you handled all</p> <p>18 these women's allegations?</p> <p>19 A. I believe maybe I said at some</p> <p>20 point that I was disappointed for not</p> <p>21 knowing, or something along those lines.</p> <p>22 I mean, look, I lost a kid. I</p> <p>23 was at the lowest point in my life. I was</p> <p>24 drinking more than I should have been. I</p> <p>25 don't remember if I -- I probably said</p>	<p>1 go about it.</p> <p>2 Q. So if a female employee, for</p> <p>3 instance, complains about her supervisor</p> <p>4 asking for a blow job, but doesn't say I</p> <p>5 want to make a report, that's not -- she</p> <p>6 didn't --</p> <p>7 MR. GOLD: Objection.</p> <p>8 Objection. Direct you not to answer.</p> <p>9 Don't answer the question. It is a</p> <p>10 hypothetical question.</p> <p>11 A. She, she -- here is my answer --</p> <p>12 MR. GOLD: Don't answer the</p> <p>13 question.</p> <p>14 A. All the women in the office</p> <p>15 routinely talked about their affairs, their</p> <p>16 dating, Marnie was sucking big, black dick,</p> <p>17 Lisa hurt her eye having sex. That's was</p> <p>18 what was going on in the office. That was</p> <p>19 daily conversation.</p> <p>20 Delaney dated a transvestite or</p> <p>21 a transgender person. Tricia was on Bumble</p> <p>22 and whatever it was. It was swiping and</p> <p>23 dating people, one of which happened to be</p> <p>24 a doctor friend of mine, who they were</p> <p>25 embarrassed I actually knew. This was</p>

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<p>1 every day in the office. Every single day, 2 who they were dating, who they were 3 banging. 4 When they would argue Lisa 5 would call Marnie white trash and that she 6 was sucking big, black dicks. And then 7 Marnie would say Lisa is a nuance and she 8 needs to go. There would be slamming 9 doors, be yelling. That was it. 10 I didn't inject any of those 11 conversations. That was being mentioned 12 outside of my door on a daily basis. 13 At some point did somebody say, 14 oh, whatever happened with Leah and 15 whatever happened with Tricia, whatever 16 with happened Lisa, yeah, all that stuff in 17 passing. 18 Did anybody come to me and say: 19 I would like to make a complaint, or I feel 20 a certain way? No. If they would have, I 21 would have done something about it. 22 That's what I'm disappointed 23 in, that maybe I was thinking to myself, 24 well, should I have been -- should I have 25 not been focused on the death of my child,</p>	<p>1 Lisa was in Israel, or after or whatever. 2 That's it. 3 There was conversations all the 4 time about, about people's personal lives, 5 my own included. 6 Lisa said: If I wanted to bang 7 Gregg Roman, I'll do it on my desk. She 8 said: I'll fuck Daniel Pipes on my desk. 9 Or something like that. Or I had a crush 10 on Daniel Pipes, he has a big brain, 11 something like that. 12 Tricia was surprised Lisa told 13 me that she had hit her eye on a table 14 while banging some guy in London. 15 Like, I didn't ask, oh, well, 16 who did you guys sleep with at this weekend 17 or that weekend, whatever. I didn't pull 18 this information out of people. This was 19 ongoing, daily discussions in the office, 20 that people brought their personal lives 21 there. 22 My personal life was the birth 23 of my child, which subsequently we had 24 lost, and that, asked whatever else I was 25 sharing about, playing poker or sports,</p>
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<p>1 should I have not been focused on the 2 struggles I was having in my marriage, or 3 just been better able to read somebody's 4 mind and saying, oh, they are having an off 5 day, maybe I should just give them a third 6 degree until they come forward with 7 whatever. 8 No, no one came to me. No, 9 none of that ever took place. 10 Q. So what does female employees 11 talking about their dating life have to do 12 with sexual harassment? 13 A. I didn't say it had anything to do 14 with it. 15 Q. Well, what are you talking about 16 right now? 17 A. I'm saying these are conversations 18 that were ongoing all the time, and among 19 those conversations was, well, what about 20 Gregg and Leah, and what about -- and then 21 after months had gone by after AIPAC, well, 22 there was -- something happened at AIPAC. 23 And then months after Israel, something in 24 Israel, or the screen shots of the text 25 messages that were from exchanges while</p>	<p>1 whatever. I don't know. 2 But your line of questioning 3 here is obviously implying that I knew 4 something, somebody told me something, I 5 didn't do anything about it. And it is 6 completely false. It is completely false. 7 Q. What about this yellow piece of 8 paper that you testified to, you said that 9 at some point in time someone showed you a 10 yellow piece of paper on a phone; is that 11 correct? 12 A. Probably about a couple days before 13 the November, whatever, 5th meeting, I 14 received a text message while I was in an 15 Uber, on the way to work, so I'm sure phone 16 records will show for whoever, can you meet 17 before you go into the office. I said, 18 "Yes." I went to the Starbucks at -- 19 Q. Well, just let me slow down, 20 because I want to understand what you are 21 testifying. So -- 22 MR. WALTON: I just want to 23 make sure he was finished his testimony. 24 This is Dave Walton. 25 Q. Go ahead. You can finish. I just</p>

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<p>1 think it might be easier if you let me ask 2 the questions.</p> <p>3 A. Well, I showed up there, and Marnie 4 showed me her phone with a screen shot of a 5 yellow piece of paper, and said: This was 6 written, sent to Daniel, you are mentioned 7 in it. Are you with us or against us? 8 Just want you to know what you are walking 9 into. Let's go to work.</p> <p>10 Q. Okay. So when is the first time 11 you saw this yellow piece of paper? Just 12 give me a date, please.</p> <p>13 A. I never saw the paper. I only saw 14 the screen shot of the paper.</p> <p>15 Q. Fine.</p> <p>16 A. Until this day, until this day, I 17 still don't even know what was in this 18 letter.</p> <p>19 Q. Fine. When is the first time you 20 saw this screen shot of the piece of paper?</p> <p>21 A. Well, if the meeting was November, 22 early November of 2018, it would have to be 23 the day before, two days before, three days 24 before.</p> <p>25 Q. Where were you when you first saw</p>	<p>1 the letter is that, well, I knew something 2 had happened and I didn't do anything about 3 it. The same one that you are making now.</p> <p>4 Q. Is it your testimony that that is 5 the first time you ever were confronted 6 with any of the allegations that were 7 raised at the November 4th, 2018 meeting?</p> <p>8 A. No. Again, they were said in 9 passing, and/or a dumbed-down version of 10 them, or a casual version of them by 11 saying: Gregg was being a dork on the 12 couch.</p> <p>13 When I first heard that Tricia 14 was unhappy about or disturbed by something 15 that happened in AIPAC I said, "Well, why 16 didn't you tell me? Why didn't you say 17 something to me?"</p> <p>18 No one ever said anything to me 19 about this stuff until the point came where 20 it was like, all right, Matt, here's -- 21 everybody has a complaint.</p> <p>22 Q. And that was --</p> <p>23 A. With --</p> <p>24 Q. And that was the yellow piece of 25 paper day, right?</p>
Page 108	Page 110
<p>1 this yellow piece of paper or the screen 2 shot of the yellow piece of paper?</p> <p>3 A. At a Starbucks at 16th and Arch.</p> <p>4 Q. Who was present at the Starbucks 5 when you first saw the screen shot of the 6 yellow piece of paper?</p> <p>7 A. Marnie and Lisa.</p> <p>8 Q. Was it only Marnie, Lisa and you 9 that were present?</p> <p>10 A. Yes.</p> <p>11 Q. Is it your testimony that that is 12 the first time that you ever heard about 13 any allegations that any of these women 14 were making?</p> <p>15 A. No, no one ever told me that there 16 was allegations in the paper. I don't know 17 what was written in the note. I was told, 18 I was told: You are mentioned, and we want 19 you to know what you are walking into. 20 And I said, "Mentioned for 21 what?"</p> <p>22 And they said: Because you 23 knew about Leah.</p> <p>24 And I said, "I knew what about 25 Leah?" And the implication that is made in</p>	<p>1 A. No. I don't know what was in the 2 piece of paper.</p> <p>3 At that meeting, when everybody 4 went around the table telling Daniel all 5 the horrible stuff about Gregg, that's when 6 stuff was being thrown into the air.</p> <p>7 Q. So then the first time you heard 8 about any of the allegations was at the 9 November 4th, 2018 meeting?</p> <p>10 A. You are referring, you are saying 11 allegations. What allegations? Which one 12 specifically?</p> <p>13 Q. That Gregg Roman sexually harassed 14 Patricia McNulty, Marnie Meyer and Lisa 15 Barbounis?</p> <p>16 A. Yes. And none of them ever said: 17 Gregg sexually harassed me. No one ever 18 said: I want to make -- I have a problem, 19 I felt uncomfortable, I have a report on 20 misconduct by a supervisor, manager or 21 whatever.</p> <p>22 Q. No one ever said that until the 23 November 4th, 2018 meeting, is that your 24 testimony, yes or no?</p> <p>25 A. No, it is not. I feel like we are</p>

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<p>1 going around in circles. You are saying 2 did I know about it. Yeah. Did I know 3 Lisa and Gregg were on the couch in Israel? 4 Yeah, because she had told me he was acting 5 like a dork on the couch and they were 6 drinking. 7 Did I know that Tricia said 8 that something, that they were sitting next 9 to each other on a couch at AIPAC, yeah, 10 because it was mentioned to me months 11 after. I don't even know how many months 12 afterwards. 13 So, yeah, were things mentioned 14 casually to me, did I know of them, yes, I 15 did know of these casual mentions. 16 Is this -- when -- at the 17 November 5th meeting was the first time, 18 yes, now there is complaints. Now, all of 19 a sudden those things turned into formal 20 complaints, and now you are implying that I 21 received complaints and then did nothing 22 with them and said go back to your normal 23 work. 24 The people who babysat my 25 daughter, the people who I attended their</p>	<p>1 professionally. Sorry? 2 Q. When was Catriona Brady hired? 3 A. I'm sure that records will show. I 4 don't know the exact date. 5 Q. Was it before the November 4th, 6 2018 meeting? 7 A. Yes, because she was there. 8 Q. How long before? 9 A. Well, she started first as an 10 intern. Put out an internship description. 11 Marnie referred her, told her to apply or 12 gave her resume. I interviewed her. 13 She interned for I guess a 14 summer. She went back to school. As she 15 approached graduation, she was applying for 16 jobs, we put out job description, 17 development something, associate, I guess, 18 and I hired her. 19 She was obviously the most 20 competent. She had experience assisting 21 with Lara's failures in organizing Gregg's 22 travel across the country, donor meetings. 23 Yeah. 24 Q. And she came on full-time in the 25 beginning of 2018, correct?</p>
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<p>1 birthday parties and met their parents and 2 was going to rent out my house to, and all 3 these people, those are the people that I'm 4 ignoring, their all mental and emotional 5 well-being, for the sake of, for the 6 sake -- at the risk of my, of my own job, 7 my own livelihood, etcetera, etcetera. 8 Q. You care about their emotional or 9 mental well-being, is that your testimony? 10 A. Oh, my God. I cared about all of 11 them, deeply. They were -- I hired and 12 trained them. I socialized with them. 13 Yes, I did. I did care about them, all of 14 them. 15 And I did, and I did take it 16 personally when they told me: You are a 17 pussy, we don't trust you, because I didn't 18 rise up and drive a stake through Gregg's 19 heart, like a monster, in front of his 20 little sister, at a November 5th meeting. 21 From that day forward I just 22 kept trying to earn back their trust and 23 friendship, at my own expense. 24 Q. When was -- 25 A. Both emotionally and</p>	<p>1 A. Well, it would logically be 2 whenever she graduated school. So whenever 3 she finished a semester. I don't know. 4 Whatever school ends, May or whatever, then 5 she probably started shortly after. 6 Q. And what else was said at the 7 Starbucks that morning? Did you leave 8 anything out? Please tell me everything 9 that was said at the Starbucks the morning 10 that you were shown this yellow piece of 11 paper or a screen shot thereof. 12 A. You asked me what else was said 13 that morning at the Starbucks? 14 Q. Just tell me the entire 15 conversation. How long were you at the 16 Starbucks? Let's start there. 17 A. Couldn't have been more than a 18 couple minutes. 19 I was disturbed by the idea 20 that -- well, at the time I guess I didn't 21 realize it was like you should be worried, 22 but I was worried because I was thinking 23 like what, what is -- like I knew something 24 was off as soon as I got a message, meet us 25 before you go into the office, so I got</p>

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<p>1 there wondering what was going on, then 2 shown a picture of something I couldn't 3 read, then told I was mentioned in it, said 4 we want you to know what you are walking 5 into, you are either with us or against us, 6 or some implication. I don't know if those 7 are the exact words. But the overall 8 message was, like, we are taking down 9 Gregg, and, by the way, in part, in doing 10 that, here you are mentioned, because you 11 have knowledge of something.</p> <p>12 And I asked to see the paper. 13 I couldn't read, I couldn't read what was 14 written on it. It was a screen shot of -- 15 I was shown a message of, like a photo of a 16 paper that was telegraphed I believe from 17 Marnie to Daniel.</p> <p>18 Q. Did anyone say anything else at 19 this meeting at Starbucks?</p> <p>20 A. That was the main points. I mean, 21 if it was, I don't, I don't recall.</p> <p>22 Q. And they told you that you were 23 mentioned in a document and showed you the 24 document, but you didn't read it; is that 25 your testimony?</p>	<p>1 Daniel came in, asked people questions. 2 Everybody's doors were closed. I didn't 3 really know what was happening at that 4 point.</p> <p>5 Q. You read the entire document, 6 that's correct, right?</p> <p>7 A. Never read, never read the letter, 8 no.</p> <p>9 Q. Never read the letter, okay. 10 That's fine, if that's your testimony.</p> <p>11 A. You can show me the letter now. I 12 mean --</p> <p>13 Q. Well, I'm going to show you a lot 14 of exhibits today, but I'm going to finish 15 the first part of the examination first.</p> <p>16 A. All right.</p> <p>17 Q. Did you testify earlier that you 18 were concerned about Catriona Brady 19 starting full-time?</p> <p>20 A. No. I asked if there was, if there 21 was a concern of theirs that should be done 22 something about before Catriona was hired.</p> <p>23 Q. Who did you ask that to?</p> <p>24 A. I believe Lisa and Tricia, I want 25 to say. It didn't seem logical I would ask</p>
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<p>1 A. I couldn't read it. It wasn't the 2 letter. It was a picture. It was like you 3 send somebody a text message, and then you 4 take a picture of a piece of paper, and 5 then show me a screen of your phone with 6 that piece of paper.</p> <p>7 I remember it was written in 8 cursive, and I couldn't understand just the 9 writing itself even by zooming in on the 10 thing.</p> <p>11 Q. Did you ever ask to just look at 12 the document?</p> <p>13 A. No. I said directly at that time, 14 I said, "What do you want me to worry 15 about? I didn't do anything wrong."</p> <p>16 I kept thinking in my head, 17 what could I possibly have done wrong that 18 they are telling me that that is in the 19 letter?</p> <p>20 Q. The question was: Did you ever ask 21 to just look at the document?</p> <p>22 A. I don't believe I did.</p> <p>23 Q. Why not?</p> <p>24 A. Things started moving very quickly 25 at that point. We got into the office.</p>	<p>1 anybody else.</p> <p>2 Q. Where were you when you asked that? 3 I'm sorry?</p> <p>4 A. I don't, I don't recall.</p> <p>5 Q. Were you in your office?</p> <p>6 A. I mean, I could have been. You 7 asked me previously, didn't you have a 8 meeting in your office where this was said 9 and I said no, I don't recall. I don't 10 think that that was the same conversation.</p> <p>11 But, no, at some point before I 12 hired Catriona, and they were talking about 13 all these, I don't know --</p> <p>14 Q. Well, you can't call them 15 allegations, right, because you testified 16 they weren't allegations, so you have got 17 to think of another word, right?</p> <p>18 A. What allegations?</p> <p>19 Q. Exactly. So what were your 20 concerns? They were telling you the issues 21 about Catriona. What were they telling 22 you?</p> <p>23 A. They weren't telling me anything. 24 They were saying that, all of a sudden it 25 seemed as if they were mentioning Gregg's</p>

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<p>1 behavior. And I said, "Is there something 2 I should worry about with Gregg?"</p> <p>3 And they said: No. No. Maybe 4 it was then Lisa used the word "No," Gregg 5 was just a big dork, although I'm pretty 6 sure it was downstairs. Like I said 7 before, I just remembered the word "big 8 dork" and I remembered that that like 9 disalarmed me, because if someone attacked 10 me or did something to me I wouldn't call 11 them a dork.</p> <p>12 Q. So they were mentioning concerns 13 about Gregg's behavior. What exactly were 14 they saying that there their concerns were?</p> <p>15 A. They didn't say they had concerns. 16 I said are these -- it was like at some 17 point when Trish said, "Oh, yeah, at AIPAC 18 this happened," I said, "Well, why wouldn't 19 you tell me that, when it happened, or even 20 after it happened, or any point in between 21 then and now."</p> <p>22 Especially because we were, 23 like we would go out to happy hour 24 sometimes until 3:00 o'clock in the 25 morning, and I considered us to be close</p>	<p>1 no longer to be in communication with 2 them."</p> <p>3 I hung up the phone and I left 4 the office. After that, Daniel then asked 5 them, everybody, "Do you have any problems 6 with Gregg?"</p> <p>7 They said: No, Gregg is fine. 8 Matt is crazy. So apparently I should have 9 risen up to destroy him on November the 10 5th, but I didn't, and for that I'm a pussy 11 and nobody trusts me.</p> <p>12 And then when I finally do do 13 it in the future, well, Matt is crazy 14 because he wants to get rid of Gregg, not 15 because we manipulated and emotionally 16 abused him for the last couple months, 17 telling him to imagine Leah Merville giving 18 him a blow job and to imagine all these 19 other things.</p> <p>20 So this is, it is for this 21 reason I tried to rise up, tried to do 22 something. And then I'm told: Well, no, 23 actually everybody seems to be okay with 24 Gregg, Matt, except you.</p> <p>25 And then I said: Well,</p>
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<p>1 and friends. I would imagine that I would 2 be the first person that somebody would -- 3 that she would say that to.</p> <p>4 They both said, no, they said, 5 no, no, Gregg is -- we have no problem with 6 Gregg.</p> <p>7 Q. So because they --</p> <p>8 A. As a matter of fact, and as a 9 matter of fact, after I tried to remove 10 Gregg by taking authoritative action or 11 unilateral action, I called a staff 12 meeting, after the November 5th meeting I 13 called Gregg on the phone, I said, "You are 14 no longer to talk to anybody in the office, 15 Lisa, Tricia, Catriona." I said, "Every 16 communication with every single person in 17 the office, now it goes through me."</p> <p>18 I remember this vividly. I had 19 my two-year-old daughter sitting on my lap 20 because I was with her that day. I had to 21 take her to the office with me.</p> <p>22 Then I called Daniel. I said, 23 "Daniel, I just want you to know what I 24 just did. I just called a staff meeting. 25 I told everyone in the office that Gregg is</p>	<p>1 obviously, I have no friends in this 2 office, at least that are going to be 3 honest with me or at least that have any 4 respect or modicum of appreciation for 5 anything, at any point, and that was it, 6 and I left.</p> <p>7 And they threw me a going away 8 party at Continental in Midtown. And I 9 have a picture of us all happy, sitting 10 around the table, Delaney, Catriona, me, 11 Lisa, Tricia. Everybody was smiling. We 12 had cocktails. We had lunch. We went back 13 to the office. We wish you well, Matt. 14 You are the best boss ever. We miss you. 15 How are we going to get through our lives 16 without you, blah, blah, blah. And then, 17 and then I don't know.</p> <p>18 Q. Who did you just testify that was 19 emotionally abused for months? You?</p> <p>20 A. What was that?</p> <p>21 Q. You just said someone was 22 emotionally abused for months. Were you 23 talking about yourself?</p> <p>24 A. Yeah, I believe I was.</p> <p>25 Q. By who? Lisa Barbounis?</p>

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<p>1 A. By whoever was, what I believe now 2 to be like an orchestrated, I don't know, 3 assuming of power or somebody was trying to 4 take over as director. 5 Q. You were trying to take over as 6 director, right? 7 A. Yes, I believed that that is what 8 they wanted me to do, until Marnie said, 9 "We don't need you to be our savior." 10 But I said, "That's what you 11 told me on November 5th downstairs," after 12 I didn't apparently try to destroy Gregg. 13 Q. All right. So I'm going to go back 14 to the conversation that you had with Lisa 15 and Tricia before Catriona Brady became a 16 full-time employee. 17 A. Okay. The conversation which I 18 told you I don't recall already, maybe 19 three times. 20 Q. But you testified, is there 21 something I have to worry about with Gregg, 22 and that they said no. Is that correct? 23 A. The first time that I learned that 24 Tricia said that something happened, which 25 was long after the fact, I was surprised I</p>	<p>1 A. I guess, I mean, if you say so, I'm 2 sure, whatever. But it sounds about right. 3 Q. Israel was April 2018, correct? 4 A. Okay. 5 Q. So whatever concerns were being 6 expressed during that time weren't because 7 of AIPAC and Israel then, right? It is 8 impossible? 9 A. So what concerns were expressed to 10 me? 11 Q. That's my next question. You don't 12 remember? 13 A. No. Well, then, that means that 14 the conversation, the one line that I do 15 remember saying is: Do I have anything to 16 worry about having just hired Catriona. 17 I mean, I don't, I don't know 18 what other things that could have been 19 brought to me before Catriona's hire. I 20 don't know. 21 Q. Let's talk about AIPAC for a few 22 minutes. So what is the AIPAC conference? 23 A. The annual conference of the 24 American Israel Political Action Committee. 25 Q. And is that a yearly conference?</p>
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<p>1 didn't hear about it or know about it via 2 someone else, Lisa or Marnie, that she may 3 have told. I said, "Well, is there 4 something to worry about with Gregg?" 5 Yes, I remember having -- I 6 remember saying that. I don't remember 7 where I said it, when I said it, whatever. 8 But I do believe it was before Catriona 9 started, yeah. 10 Q. Based on that you were comfortable 11 allowing Catriona to become a full-time 12 employee, correct? 13 A. Yep. They both said, like, nothing 14 to worry about here. 15 Q. And if I told you that Catriona 16 became a full-time employee in January of 17 2018, does that make sense? Does that 18 sound right to you? 19 A. I mean, it could, I guess, if she 20 finished school in December of 2017. 21 Q. All right. And that's before AIPAC 22 and it is before Israel, right? 23 A. Before AIPAC? 24 Q. Yeah, AIPAC was in March 2018, 25 correct?</p>	<p>1 A. Yep, I believe so. 2 Q. Where does that conference take 3 place every year, if it does take place in 4 the same place every year? 5 A. Washington, D.C., as long as I have 6 been going to it. 7 Q. In 2018 did you attend the AIPAC 8 conference? 9 A. Yep. 10 Q. And in 2018 who else from the 11 Middle East Forum attended the AIPAC 12 conference? 13 A. Our D.C. staff obviously, because 14 they were there. So EJ, Cliff. Then the 15 people from the office that came, which 16 were me, Gregg, Lisa, Tricia, Marnie. 17 If you are saying Catriona was 18 already there at that point, maybe 19 Catriona. But I don't think I remember her 20 being there. 21 Q. Let's just say she was either an 22 intern, or it was sometime after she became 23 an intern, we will say, for now. 24 A. Let's just say what? 25 Q. We can just agree that she was an</p>

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<p>1 intern before that, at least.</p> <p>2 A. Before AIPAC?</p> <p>3 Q. Yes.</p> <p>4 A. Yeah, of course.</p> <p>5 Q. She wasn't at the AIPAC conference,</p> <p>6 correct?</p> <p>7 A. No, I don't remember, I don't</p> <p>8 remember her being there.</p> <p>9 Q. So it was --</p> <p>10 A. I think somebody, somebody came for</p> <p>11 the dinners or something and then left to</p> <p>12 go, maybe to go back to Philadelphia. But</p> <p>13 I don't think it was her, no.</p> <p>14 Q. So it was Gregg Roman, Lisa</p> <p>15 Barbounis, Marnie Meyer, and Patricia</p> <p>16 McNulty. Anybody else?</p> <p>17 A. Yeah, I just said the D.C. staff.</p> <p>18 Q. The D.C. staff is how many people?</p> <p>19 A. At the time I think it was Cliff</p> <p>20 and EJ. I'm not sure if -- oh, maybe Sam</p> <p>21 Westrop. But he was in Boston. So I don't</p> <p>22 know. Maybe Samantha that worked with him.</p> <p>23 I don't know if she was there at that time</p> <p>24 or whatever.</p> <p>25 But anybody that would have</p>	<p>1 conference.</p> <p>2 Q. Do you remember if it was two or</p> <p>3 three nights?</p> <p>4 A. No. But, again, I'm sure there is</p> <p>5 a receipt or something to show.</p> <p>6 Q. You can only testify to the way you</p> <p>7 remember.</p> <p>8 A. I don't remember how many nights,</p> <p>9 no, I'm sorry.</p> <p>10 Q. So, and did Patricia McNulty, Lisa</p> <p>11 and Marnie, did they share that Airbnb with</p> <p>12 you guys, or did they get their own rooms?</p> <p>13 A. They had their own rooms. I don't</p> <p>14 know if it was a room or rooms. I just</p> <p>15 know that they had their own</p> <p>16 accommodations.</p> <p>17 Q. Okay. Did the AIPAC conference</p> <p>18 start on a Friday?</p> <p>19 A. No. Usually it would start at the</p> <p>20 end of Shabbat, so maybe a Saturday night.</p> <p>21 Usually there is like, just like -- it</p> <p>22 usually starts on an evening the day before</p> <p>23 the actual happenings of the conference</p> <p>24 begins. So if it was -- yeah, Saturday</p> <p>25 night sounds right. And then they would</p>
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<p>1 been in D.C. would have probably been</p> <p>2 there. Anybody that was based in D.C., I</p> <p>3 guess.</p> <p>4 Q. All right. And so where did you</p> <p>5 stay during the conference?</p> <p>6 A. At an Airbnb. It was like an</p> <p>7 apartment. Yeah, I think it was like a</p> <p>8 hotel apartment or an Airbnb. I don't</p> <p>9 remember the address.</p> <p>10 Q. And did you stay at that Airbnb</p> <p>11 with anybody?</p> <p>12 A. Yeah, Gregg, another friend of mine</p> <p>13 from home. I think he was there. He</p> <p>14 didn't stay there. And whoever slept there</p> <p>15 from the group.</p> <p>16 I think, I don't know, there</p> <p>17 was I think three bedrooms. Somebody</p> <p>18 played a game for the bedroom. I don't</p> <p>19 know if Lisa won or Tricia won. Somebody</p> <p>20 had to sleep on the couch. The other</p> <p>21 people stayed in the rooms.</p> <p>22 Q. So how long did you have an Airbnb</p> <p>23 for?</p> <p>24 A. However, probably two nights or</p> <p>25 three nights, however long, duration of the</p>	<p>1 have all the breakout sessions and the</p> <p>2 plenaries on the Sunday and Monday.</p> <p>3 Q. So the first night you slept down</p> <p>4 there was that Saturday?</p> <p>5 A. Yep. I mean, again, to the best of</p> <p>6 my recollection. Whatever, I don't know</p> <p>7 the dates.</p> <p>8 Q. I just looked it up while we were</p> <p>9 sitting here. If I said it was like March</p> <p>10 4th, 2018, does that sound right?</p> <p>11 A. Okay.</p> <p>12 Q. March 4th, 2018 was a Sunday. So</p> <p>13 the weekend of the 3rd and the 4th and the</p> <p>14 5th, does that sound about right?</p> <p>15 A. Yeah. We wouldn't have gotten</p> <p>16 there for the, for just the nighttime</p> <p>17 activity on Saturday night. So it seems</p> <p>18 right, Sunday night, Monday night, and</p> <p>19 then, yeah, leave on Tuesday, I guess.</p> <p>20 Q. So the night when this incident</p> <p>21 occurred that we are building toward was</p> <p>22 that Saturday or Sunday? Do you remember?</p> <p>23 A. Probably whatever, whatever date</p> <p>24 the event was, where there was a big dinner</p> <p>25 at Cuba Libre. That's why we needed so</p>

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<p>1 many like all hands on deck, so to speak. 2 We had donors, we had writing fellows, we 3 had grantees. It was like, it was a big 4 deal for us to be holding like, you know, a 5 big event during AIPAC. 6 And I believe that after that 7 event, yeah, we went out like celebrating. 8 I was dancing with Marnie, spinning her 9 around on the dance floor, went bar 10 hopping, all of us as a group, drinking. 11 So likely after the event, because we are 12 not going to wake up the next day, you 13 know, all hung over and then try to execute 14 one of the biggest events we were trying to 15 pull off. 16 Q. So that was that first night that 17 you had that you guys all went out and did 18 that, right? It was like that Saturday? 19 If you don't know, just say you 20 don't know. That's fine. 21 A. I don't know. I don't know. I 22 mean, I don't know, no. 23 Q. That's fine. So, but you do 24 remember, like I think it was the night 25 that you guys threw a dinner for donors,</p>	<p>1 remember. Then, yeah, we all got in Ubers 2 and we bent back to the Airbnb. Somebody 3 ordered pizzas. We were having, it was 4 like a party there as well. 5 Q. And how did you get back to your 6 Airbnb when it all ended, when you were 7 done going out to bars and stuff like that? 8 A. I don't, I don't remember. But 9 likely Uber. If it was close enough we 10 would have walked. I always prefer walking 11 to car share or any type of taxi when 12 possible. So I would have said, hey, we 13 could walk, if we were able to. If not, we 14 probably took an Uber. 15 Q. Do you remember who else took that 16 Uber with you? 17 A. No. 18 Q. Do you remember what time it was 19 about when you got back to your Airbnb? 20 A. No. 21 Q. And do you remember who was back at 22 the Airbnb with you at the end of the 23 night? 24 A. No. I mean, there was a lot of 25 people. I just remember there was a lot of</p>
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<p>1 right? 2 A. Yeah, that's the one I'm talking 3 about. I believe it was at Cuba Libre. 4 Q. Cuba Libre, after the dinner for 5 donors, you went to another event after 6 that? 7 A. Yeah, we went to several, several 8 things. I don't remember. But I know that 9 there was, I think there was an 10 invitation-only type thing that we had sort 11 of just showed up at. I don't remember 12 what it was. I'm sure there was -- you 13 know, I remember we went to like a big 14 nightclub/bar, because I remember there was 15 a dance floor. I remember dancing. I 16 think it was hosted by another 17 organization, like an after-party. So we 18 went to a couple, we went to a couple 19 places. 20 Q. When that all ended, tell me what 21 happened next. 22 A. There was like last call probably, 23 whatever time that they shut down. Could 24 have probably very late, 2:00 a.m., 25 something, whatever D.C. law is. I don't</p>	<p>1 people there. 2 Q. Okay. So let me go one at a time. 3 You were there, correct? 4 A. Yeah, yeah, I stayed there. 5 Q. Gregg Roman was there? 6 A. Yep. 7 Q. Was Patricia McNulty present? 8 A. Yeah. 9 Q. Was Lisa Barbounis present? 10 A. Yeah. I believe all the girls, all 11 the Philadelphia staff were there. 12 Q. Marnie Meyer, she was present? 13 A. Yeah. 14 Q. And was someone named Akeem 15 present? 16 A. I don't know any Akeem. 17 Q. Was there anyone else there 18 besides, was there someone named Raheem 19 present? 20 A. Was there someone what? 21 Q. Raheem. I think I said Akeem. I 22 meant Raheem. Sorry. 23 A. Oh, Raheem. 24 Q. Raheem. 25 A. Yeah, I think he is the one that</p>

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<p>1 ordered the pizzas.</p> <p>2 Q. Kassam, was there someone named</p> <p>3 Kassam there?</p> <p>4 A. Kassam? I mean there is Sam. Oh,</p> <p>5 Kassam, I think that's Raheem's last name.</p> <p>6 Q. Raheem Kassam. So was there anyone</p> <p>7 else besides, you know, the MEF staff and</p> <p>8 Raheem. I think I heard there might have</p> <p>9 been some fellows there or something like</p> <p>10 that or some people from another</p> <p>11 organization?</p> <p>12 A. Yeah, there was another --</p> <p>13 Q. Pink Skirt maybe?</p> <p>14 A. Yeah, exactly. There was a couple</p> <p>15 -- yeah, those guys. I don't know, I don't</p> <p>16 remember which. There were at least maybe</p> <p>17 one or two of them. Which ones, I don't</p> <p>18 know. But, yeah, somebody was there.</p> <p>19 Q. And that was just about everybody?</p> <p>20 If you remember. If you don't, just say I</p> <p>21 don't remember, that's fine.</p> <p>22 A. Yeah, I don't remember. I mean I</p> <p>23 believe so. I didn't remember that they</p> <p>24 were there until you told me just now.</p> <p>25 But, yeah. Well, yeah, there was a lot of</p>	<p>1 Q. And --</p> <p>2 A. Unless, unless, I mean, whatever,</p> <p>3 unless my wife wanted to talk. It is</p> <p>4 possible. Or, I don't know, or I had too</p> <p>5 much to drink.</p> <p>6 But usually I, like the</p> <p>7 caretaker, making sure everything goes as</p> <p>8 planned and etcetera, etcetera.</p> <p>9 Q. So you said at some point in time</p> <p>10 someone played a game for a room. I think</p> <p>11 I have heard testimony that Lisa and Marnie</p> <p>12 flipped a coin to see who got the extra</p> <p>13 room. Is that what you were referring to?</p> <p>14 A. It sounds right. I just remember</p> <p>15 that there was an extra bedroom, and I</p> <p>16 think the couch was obviously a pull-out</p> <p>17 bed or something. It was a big, it was a</p> <p>18 really big place. I think there was three</p> <p>19 bedrooms. So, yeah, somebody, yeah, there</p> <p>20 was a game or something. I don't, I don't</p> <p>21 remember -- I don't know the details. But</p> <p>22 somebody -- I believe it was Tricia. I</p> <p>23 believe it was Tricia.</p> <p>24 Q. Tricia had the bedroom?</p> <p>25 A. I believe so.</p>
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<p>1 people. So I mean, obviously, if it was</p> <p>2 us, then Raheem and them.</p> <p>3 Q. And so during this event my client,</p> <p>4 who is, actually both my clients, Lisa and</p> <p>5 Patricia have alleged that Gregg Roman</p> <p>6 stuck his hands on them in an inappropriate</p> <p>7 way. Did you see that happen?</p> <p>8 A. No.</p> <p>9 Q. Did you go to sleep? Did you have</p> <p>10 -- strike that.</p> <p>11 Did you have your own room at</p> <p>12 this Airbnb?</p> <p>13 A. Yeah.</p> <p>14 Q. At some point in time did you</p> <p>15 retire to your room and kind of leave</p> <p>16 everybody?</p> <p>17 A. Yeah, sure. I mean I woke up in</p> <p>18 the bed.</p> <p>19 Q. Do you remember if like everyone</p> <p>20 was still up when you went to your room, or</p> <p>21 were you one of the last people that shut</p> <p>22 it down, if you remember?</p> <p>23 A. I'm the type that I can hang, so to</p> <p>24 speak. So if it was still going on, I</p> <p>25 would be the last one there.</p>	<p>1 Q. And Lisa, where was she? Do you</p> <p>2 know where she slept?</p> <p>3 A. No. But I don't even know -- when</p> <p>4 I woke up, I woke up in the morning,</p> <p>5 everybody was gone. And I woke up pretty</p> <p>6 early too. And I remember thinking that,</p> <p>7 like, wow, everybody woke up, you know,</p> <p>8 they cleared out quick. But so, no, I</p> <p>9 don't know where anybody slept.</p> <p>10 Q. So did you see anything that</p> <p>11 evening that caused you any kind of</p> <p>12 concern?</p> <p>13 A. Hold on one second. I got to let</p> <p>14 the dog out.</p> <p>15 Q. Yeah, take your time.</p> <p>16 MR. WALTON: I haven't eaten</p> <p>17 lunch.</p> <p>18 MR. GOLD: Let's take a break.</p> <p>19 MR. CARSON: All right. Let's</p> <p>20 do like, we will come back at like 1:35 or</p> <p>21 something like that. I'm sorry. 2:15.</p> <p>22 THE WITNESS: I mean, I like to</p> <p>23 go faster if it is possible. I would like</p> <p>24 a five-minute break.</p> <p>25 (Discussion off the record.)</p>

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<p>1 MR. GOLD: 2:15 is good for you</p> <p>2 to take a break, Matt.</p> <p>3 (Lunch recess taken.)</p> <p>4 THE VIDEO SPECIALIST: We are</p> <p>5 back on the record.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. I think when we stopped we were</p> <p>8 talking about the AIPAC conference. And</p> <p>9 you said that you didn't see anything that</p> <p>10 caused you concern that evening with regard</p> <p>11 to Gregg Roman, Lisa Barbounis and Patricia</p> <p>12 McNulty, correct?</p> <p>13 A. Correct.</p> <p>14 THE COURT REPORTER: Mr.</p> <p>15 Carson, this is the court reporter. I have</p> <p>16 lost visual on you.</p> <p>17 (Discussion off the record.)</p> <p>18 Q. And do you know what time Gregg</p> <p>19 Roman left the gathering and went to bed?</p> <p>20 A. No.</p> <p>21 Q. You have to speak up a little bit</p> <p>22 for the court reporter.</p> <p>23 A. No, no.</p> <p>24 Q. Do you know whether it was like</p> <p>25 before you or after you? Or, no, you don't</p>	<p>1 the allegations that Patricia made</p> <p>2 regarding Gregg Roman's conduct at the</p> <p>3 AIPAC conference?</p> <p>4 A. I would be guessing if I gave a</p> <p>5 date. I really don't know.</p> <p>6 Q. Well, is it fair to say you learned</p> <p>7 about those allegations on November 4th,</p> <p>8 2018?</p> <p>9 A. Yeah, definitely. I mean I -- I</p> <p>10 can't say for sure. Maybe it was after. I</p> <p>11 don't know, unless, if it was said then,</p> <p>12 then, yeah, I learned about it. I don't</p> <p>13 remember what was said then exactly.</p> <p>14 Q. So my question was going to be:</p> <p>15 Did you hear about it before that, before</p> <p>16 that November 4th meeting?</p> <p>17 A. I mean if I did, I don't remember</p> <p>18 when. I couldn't give a date.</p> <p>19 Q. And I just wanted to kind of clean</p> <p>20 something up for the record.</p> <p>21 A. Sure.</p> <p>22 Q. During the break I looked at some</p> <p>23 documents, and I believe Catriona Brady may</p> <p>24 have began as a full-time employee sometime</p> <p>25 around May 2018, like at the end of the</p>
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<p>1 remember?</p> <p>2 A. I don't remember.</p> <p>3 Q. When is the first time -- sitting</p> <p>4 here today, you are aware that Patricia</p> <p>5 McNulty has alleged and Lisa Barbounis has</p> <p>6 alleged that Gregg Roman put his hands on</p> <p>7 them in an inappropriate manner, correct?</p> <p>8 You are aware of those allegations?</p> <p>9 A. I believe that -- well, I was</p> <p>10 aware, Leah in Israel and Tricia at AIPAC.</p> <p>11 Q. Are you aware that Leah has alleged</p> <p>12 that Gregg Roman, when he put his arm</p> <p>13 around Patricia and lifted her up onto his</p> <p>14 lap, that he also put his arm around Lisa</p> <p>15 and pulled Lisa toward him? Did you know</p> <p>16 that?</p> <p>17 A. No, I don't believe so.</p> <p>18 Q. So I understand sitting here today</p> <p>19 you are aware of these allegations, so my</p> <p>20 question is: When did you first become</p> <p>21 aware of those allegations that either</p> <p>22 Patricia or Lisa made?</p> <p>23 Well, if you didn't know about</p> <p>24 Lisa's, let's just keep it to Patricia's.</p> <p>25 When is the first time you became aware of</p>	<p>1 school year.</p> <p>2 A. Yeah, that's what I guessed</p> <p>3 originally, is that it would have to be</p> <p>4 following, you know, academic year.</p> <p>5 Q. So a couple of my questions were</p> <p>6 based on if she might have started</p> <p>7 full-time in January. I just wanted to</p> <p>8 make that clear for the record. I think</p> <p>9 you were right when you said it was in May</p> <p>10 2018, so I just wanted to make it clear.</p> <p>11 So now that we know that she</p> <p>12 started in May 2018 as a full-time</p> <p>13 employee, is it possible that the concerns</p> <p>14 that Patricia and Lisa told you about with</p> <p>15 regard to Gregg were the Israel and the</p> <p>16 AIPAC concerns?</p> <p>17 A. I'm sorry, what was the question?</p> <p>18 Q. So earlier you testified that</p> <p>19 before Catriona became a full-time employee</p> <p>20 that you asked the question, hey, is there</p> <p>21 something I need to worry about. And, you</p> <p>22 know, I guess you were concerned about</p> <p>23 bringing Catriona on full-time if there</p> <p>24 were concerns about Gregg Roman, correct?</p> <p>25 A. I don't know if it was before. But</p>

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<p>1 I remember thinking that, you know, she was 2 young, that, straight out of, straight out 3 of school. They were nearing 40, had been 4 around the block, so to speak. So it 5 wasn't like -- you know, if there was like 6 somebody who wouldn't know what to do in 7 that scenario, it would be her.</p> <p>8 Q. And so you asked, and I think, I'm 9 trying to just reiterate just to get the 10 timing right, so you asked Patricia and 11 Lisa: Is there something I need, should I 12 be worried about bringing her here 13 full-time?</p> <p>14 A. Or it could have been after she was 15 there and I was saying, like, do I need to 16 like pay close attention, or is there 17 something that, you know, like that you are 18 saying that would be, like make her 19 uncomfortable, risky, etcetera.</p> <p>20 I was basically looking out to 21 say as the person who hired her for her 22 internship and then invited her to work.</p> <p>23 Q. So as I guess just knowing that -- 24 so is it possible that when you made that 25 statement it was in response to learning</p>	<p>1 A. I thought it was November the 5th 2 for some reason. But you are talking about 3 the meeting, like the big meeting?</p> <p>4 Q. Yeah. So I'm representing that it 5 was either the 4th or the 5th. I'm talking 6 about a meeting where Daniel Pipes and you 7 and my clients, and I guess some of the 8 other people who worked at the Middle East 9 Forum, were all present, and you guys met 10 to discuss I guess Gregg Roman that day, 11 correct?</p> <p>12 A. Yeah. That was an emergency staff 13 meeting, or whatever it was called, yeah. 14 We were all told that day and time.</p> <p>15 Q. I've heard some people refer to it 16 as D Day. Have you ever heard it referred 17 to that, as D Day?</p> <p>18 A. I don't think so. But, I mean, 19 possibly.</p> <p>20 Q. How about, there is a movie called 21 V for, V or V for Vendetta?</p> <p>22 A. Yeah, that's why I think, that's 23 why I remembered November the 5th, because 24 I remember, remember, remember, the 5th of 25 November, and they say that in the movie,</p>
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<p>1 about AIPAC and Israel, what my clients 2 were alleging occurred at AIPAC and Israel?</p> <p>3 A. It's possible. I just remember 4 that I had, you know, my natural instinct 5 was should I be concerned for somebody that 6 now I'm responsible for.</p> <p>7 Q. I didn't think it was fair because 8 some of my questions were based on saying 9 it was January 2018. I just wanted to make 10 that clear.</p> <p>11 A. Okay. The timeline for me is, it 12 is hard.</p> <p>13 Q. And your testimony is you actually 14 don't remember that this --</p> <p>15 THE COURT REPORTER: I'm sorry, 16 that this? I couldn't hear the question.</p> <p>17 Q. I'm giving the witness an 18 opportunity just to say for the record he 19 doesn't actually, you don't actually 20 remember the specific timeline when these 21 things happened, correct?</p> <p>22 A. Correct, correct.</p> <p>23 Q. So I just want to go skip ahead. 24 So November 4th, 2018, tell me what 25 happened that day.</p>	<p>1 yeah.</p> <p>2 Q. I think you made that I guess joke 3 at some point in time about, hey, that's 4 weird, remember, remember, the 5th of 5 November, referencing that movie, correct?</p> <p>6 A. Yeah, I believe so.</p> <p>7 Q. All this is a roundabout way --</p> <p>8 A. I remember the reference. I don't 9 know if I was the one who thought it up. 10 But, yeah.</p> <p>11 Q. That's the meeting I'm talking 12 about. Tell me what happened that day.</p> <p>13 A. Okay. Yeah. We all gathered 14 around, and Daniel sort of just said: What 15 is going on in this place? And everybody 16 had the opportunity, it was like an airing 17 of grievances so to speak. Everybody 18 seemed to have something different to say 19 or like whatever their gripes were.</p> <p>20 Mine specifically were that 21 Gregg didn't include me in like the website 22 development, and that was something that, 23 you know, I thought I could have been 24 helpful with, and just more like 25 administrative/operational sort of</p>

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<p>1 decisions that I thought I could have 2 benefited the organization had I been -- 3 had some hand in it.</p> <p>4 Everybody else had more, 5 obviously, what we are referring to as 6 allegations. And Delaney said she had 7 brought pepper spray. Lisa and Trish were 8 -- I believe they had mentioned what we 9 have been talking about that happened in 10 Israel.</p> <p>11 I can't remember what everybody 12 said specifically. I just remember sort of 13 thinking like, well, what is going to 14 happen next.</p> <p>15 And then sort of Stacy, who I 16 was also responsible for or managing, and, 17 you know, trying to like defend her brother 18 against, you know, basically everyone else. 19 I remember I got emotional, like if it was 20 my little sibling or something, and then, 21 you know, they are like on their own 22 versus, you know, everyone else. I just 23 thought it was like sort of not fair.</p> <p>24 But she was trying to digest 25 the information and then sort of offer I</p>	<p>1 Pipes was there?</p> <p>2 A. At the bar afterwards or in the 3 staff meeting?</p> <p>4 Q. In the staff meeting.</p> <p>5 A. Everyone who worked in the office. 6 So if I go around the table or we will go 7 around the offices, it would be Daniel, 8 Marnie, myself. Gregg was supposed to be 9 there but didn't come that day or Daniel 10 told him not to. Lisa, Tricia, Catriona, 11 Delaney, Thelma. I think that's it.</p> <p>12 Q. Did you say --</p> <p>13 A. And Stacy. And Stacy.</p> <p>14 Q. So it is Daniel Pipes, Marnie 15 Meyer, Matthew Bennett, Lisa Barbounis, 16 Thelma Prosser, Delaney Onchek, Catriona 17 Brady, and Stacy Roman. Is that everybody?</p> <p>18 A. I believe so. I don't think there 19 was anybody else.</p> <p>20 Q. Did Daniel Pipes start the meeting 21 by talking to everyone about stuff?</p> <p>22 A. I don't remember how it opened, to 23 be honest. Sort of just shellshocked 24 having to be there. It was like 25 surprising.</p>
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<p>1 think her take on it or whatever. She 2 might have or didn't have knowledge of.</p> <p>3 And I remember the only thing 4 that I introduced into that meeting was, 5 you know, like website, administrative, 6 operational type stuff, which after that 7 they basically said, like, oh, Matt just is 8 obviously -- as long as, you know, Gregg is 9 around, Matt will be, you know, loyal to 10 him. And so, you know, he is, in the words 11 of Marnie and Lisa, Matt is a pussy, I 12 don't -- I'll never trust you.</p> <p>13 Q. They said that at the meeting?</p> <p>14 A. No, no. After the meeting we all 15 went, as I said before, down to 16th and 16 Arch. There is a bar there, close to the 17 Starbucks where I met Lisa and Marnie 18 originally, and we all were sitting around 19 like a booth, and right in front of 20 everybody, in front of the whole team, in 21 front of the whole staff, Lisa and Marnie 22 said: You are a pussy, I'll never trust 23 you.</p> <p>24 Q. Can we get a list of people who 25 were present at that meeting? So Daniel</p>	<p>1 Q. Did Daniel Pipes say the reason why 2 he had called this meeting?</p> <p>3 A. I believe it was the letter.</p> <p>4 Q. So the meeting was called to 5 discuss a letter that was submitted to 6 Daniel Pipes?</p> <p>7 A. Yeah, I believe so. And maybe 8 conversations that followed.</p> <p>9 Q. And what did Lisa say at the 10 meeting? Did she say what happened? Did 11 she say what happened, what she alleged 12 happened in Israel?</p> <p>13 A. Probably. I believe so.</p> <p>14 I was really focused on myself 15 at that point. I was -- for all I knew, we 16 were all being gathered to be informed that 17 we were being let go. I didn't -- I had no 18 idea what was -- like I said, in the 19 letter, I didn't know what had taken place 20 that maybe no one didn't inform me of. I 21 was sort of just waiting to see what, 22 exactly what was happening. It was like a 23 soap opera.</p> <p>24 I wasn't remembering everything 25 or taking note of everything everybody was</p>

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<p>1 saying. You know, I was mostly just 2 thinking about when it came, Matt, do you 3 have anything to say, I said the website 4 and vendors, I could be more helpful with 5 IT, things of that nature. But that was 6 it. 7 Q. So you used -- 8 A. And I defended, I defended Stacy, I 9 believe. I'm not sure how, but I remember 10 they were angry at me or, you know, felt 11 that I was like a traitor for defending 12 Stacy. 13 Q. Do you think it was appropriate for 14 Stacy to be there? 15 A. Well, she was a member of the team. 16 May or may not have had direct knowledge of 17 all the stuff that was going to be talked 18 about. Could have been -- maybe things 19 could have been said a little bit 20 differently or, I don't know, more politely 21 taking note that she is his sister, she is 22 Gregg's sister. But I'm not sure -- 23 Q. Do you think it was fair -- 24 A. I don't know if it is inappropriate 25 just because they are brother and sister.</p>	<p>1 Q. Why did -- 2 A. In reality, I was looking out for 3 her in the same way I thought I was trying 4 to look out for Catriona, asking, well, 5 does Catriona have something to worry -- do 6 I have something to worry about with 7 Catriona and well-being of everybody else. 8 So... 9 Q. Why did it hurt you to be there? 10 A. It seemed like, seemed like the 11 organization was falling apart, like 12 somebody just set off a bomb inside of, 13 inside of the office. 14 I mean, how do you continue end 15 of your fund raising events, travel, 16 intellectual output, content, marketing, 17 whatever, with everybody -- this suddenly 18 took center stage at the time where, I 19 don't know how much more money I had to 20 raise to the end of the year, 1. something 21 million dollars outstanding and uncollected 22 renewals or contributions. 23 I remember thinking like if, if 24 I had to do my job now in the absence of 25 Gregg, I'm going to need this team to, you</p>
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<p>1 Q. Well, do you think it was fair to 2 the women who were there to report sexual 3 harassment that they needed to say things 4 more carefully because Gregg, because the 5 harasser -- because the harasser's sister 6 was present? 7 A. I don't believe that anything was 8 held back. 9 Q. So that was probably tough on Stacy 10 Roman then, right? 11 A. I just remember thinking that, you 12 know, she responded with, you know, like 13 she was pretty like calm in her responses. 14 I mean, obviously, like I could tell she 15 was hurt. Like I worked with the girl for 16 awhile. But she was hurt to sit there and, 17 you know, and have this going on. It was 18 hurting me to sit there and I'm not related 19 to Gregg. And so I'm thinking, you know, 20 look how she feels. 21 I don't remember what I said 22 exactly in Stacy's defense, but I remember 23 that me sticking up for her in their mind 24 was like, oh, Matt is a traitor, you know, 25 whatever.</p>	<p>1 know, to come together, and I remember that 2 going through my head. 3 And then when they subsequently 4 said: I don't trust you, you are a pussy, 5 etcetera, etcetera, I said: Well, there is 6 no way I'm going to be able to raise that 7 money, there is no way I'm going to be able 8 to hold everything together if that's, if 9 that's how they view me at this point, 10 after having hired them, trained them, been 11 their friend, mentored them, attended 12 birthday parties, invited them into my 13 home. So... 14 Q. Did Patricia McNulty talk about 15 what happened at the AIPAC conference 16 during this meeting? 17 A. Possibly. I don't remember. 18 Q. So what did Stacy say? 19 A. I don't remember. I just remember 20 that sort of, it was like everybody on 21 Stacy. Thelma just sat quietly, just 22 letting, letting it all wash over her. 23 Because I don't think she knew anything or 24 was around anything. But seemed like 25 everybody had something to say about Gregg,</p>

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<p>1 and she was trying to defend. I just 2 remember like seeing somebody that was 3 under distress, in the same way I cared 4 about Lisa, Tricia, Catriona and Delaney, I 5 see someone else who I have known even 6 longer than them, worked with longer, was 7 closer with, you know, with tears behind 8 her eyes, thinking that the right thing to 9 do in that situation for the manager is to 10 look out for the well-being of, you know, 11 of everyone, even if -- so I tried to do 12 that in defending Stacy, and it didn't go 13 over well.</p> <p>14 Q. Do you know whether Middle East 15 Forum maintained a policy to prevent sexual 16 harassment during the time that you worked 17 there?</p> <p>18 A. There were I think documents that, 19 you know, like an on-boarding packet, you 20 know, said if this, if you see, if you feel 21 this way or something, then report it to 22 this person. And if you are this person or 23 in this department, then report it to that 24 person.</p> <p>25 You know, so we did a sexual</p>	<p>1 place between November 4th and -- I don't 2 remember it taking place in my final three 3 months, so...</p> <p>4 But to be honest, like I said, 5 again, if I told you, I don't know, I don't 6 remember.</p> <p>7 Q. What happened after the meeting -- 8 strike that.</p> <p>9 How did the meeting conclude? 10 Did Daniel Pipes announce any policy change 11 or any conclusion?</p> <p>12 A. Well, yeah, he said, "Gregg is 13 banished from the office." I believe that 14 concluded the meeting. Or that was like, 15 like, all right, he was no longer -- he 16 will no longer be here.</p> <p>17 And then I said, "How about we 18 all go for a drink?" And that's how we 19 ended up at Tir na nOg, I believe it was.</p> <p>20 Q. So Daniel Pipes' response to all 21 these allegations of sexual harassment was 22 that Gregg Roman was no longer permitted to 23 attend or visit the Philadelphia office; is 24 that your testimony?</p> <p>25 A. Well, in that moment, in front of</p>
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<p>1 harassment training also. I remember 2 somebody came, I think we did -- maybe that 3 was another organization. I'm pretty sure 4 there was something signed, unless I'm 5 mistaken.</p> <p>6 Q. Did you ever do any sexual 7 harassment training when you worked with 8 the Middle East Forum?</p> <p>9 A. I know there was a security 10 workshop, I think, and as part of like an 11 all around sort of HR thing, Marnie may 12 have organized a security expert to come 13 in. Maybe there was a -- yeah, actually I 14 think, yeah, I believe everybody sat around 15 with a table, maybe, at some point, and it 16 was made clear -- I think Gregg actually 17 moderated the meeting. Maybe it was 18 Daniel. But I mean it was obvious, you 19 know, there was some -- you know, people 20 knew, obviously, if you are harassed, this 21 is what to do.</p> <p>22 Q. When was that?</p> <p>23 A. I would be guessing.</p> <p>24 Q. Was it before November 4th, 2018?</p> <p>25 A. I mean, I don't remember it taking</p>	<p>1 everybody, before we adjourned, I believe 2 that that is what was said, and that held 3 true. He never came back.</p> <p>4 Q. Never --</p> <p>5 A. The time while I was there, he 6 never came back.</p> <p>7 Q. What about his employment in 8 general, did he continue working with the 9 Middle East Forum?</p> <p>10 A. I have no way to know that. I 11 mean, I checked the website at some point, 12 and he was still listed as director, so, I 13 mean, unless he left and then he was 14 rehired. I don't know.</p> <p>15 Q. You are testifying today that you 16 don't know whether Gregg Roman continued 17 working with the Middle East Forum after 18 November 4th, 2018?</p> <p>19 A. Of course he did. He, during the 20 time that I was there, he was still working 21 with MEF. And, I don't know, January or 22 February I held a meeting, when I called 23 him and I said, "Gregg, you are no longer 24 to contact anybody in the office, only go 25 through me."</p>

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<p>1 Daniel said, "Well, let me ask 2 the women if that's their position." 3 They all said: No, Matt is 4 crazy, we are fine working with Gregg over 5 the phone, and text and whatever. 6 So I looked like I was just off 7 my rocker and seeking to usurp him and then 8 take control as director. 9 Q. When was that? 10 A. At some point between November the 11 4th and March the 9th. 12 Q. Well, do you know, can you be more 13 precise? 14 A. I just remember I had my daughter 15 with me that day, I took her to work. 16 Q. Did it happen in 2018? Was it 17 2019? 18 A. I think it was after, I believe it 19 was after the New Years party. It was 20 after that, I remember, yeah. 21 Q. After the New Years party you 22 called Gregg and told Gregg not to contact 23 any of the women? 24 A. I called the staff meeting. I had 25 everybody gather in the same conference</p>	<p>1 A. Yeah. 2 Q. Why did you call a staff meeting? 3 A. So that they would all see that I 4 was stepping in to make sure that whatever 5 they are saying, this uncomfortable, this 6 harassment that they alleging, it would, 7 poof, be gone because they would no longer 8 have to deal with him, personally, through 9 the phone, through a message, through an 10 e-mail. So I volunteered myself to be the 11 buffer and take on whatever, you know, 12 other work that would not necessarily be 13 through development or, like the stuff I 14 wasn't involved in, but take that on. I 15 would then be responsible for, as a 16 go-between. 17 Q. So what prompted that staff 18 meeting? Why did you feel like you needed 19 to call a staff meeting about harassment in 20 January, or sometime after that, 2019? 21 A. I didn't call a staff meeting about 22 harassment. There was like the harassment 23 training, which I believe was 2018, maybe 24 like -- I don't know, probably after -- 25 maybe like -- it was probably around the</p>
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<p>1 room that the original meeting took place. 2 I called Gregg, I said, "You are not to 3 contact anybody in the office anymore. If 4 you want to give a directive to any one of 5 the women or anybody, it goes through me. 6 I will then filter everything and then 7 relay it back to you." 8 He said, "Okay. No problem." 9 I'm off the phone with him, 10 then I called Daniel straight away. 11 Daniel, I just want to let you know what I 12 did. And his response to me was, like, I 13 didn't tell you to do that. And I said, 14 "Well, I did it." 15 And then I guess he had asked 16 everybody, you know, did Matt do that 17 because he was compelled -- because, on his 18 own volition, or was it, did you guys want 19 him to do it. And then when he asked 20 everybody, apparently they said no, 21 everybody was fine, and that I was, I was 22 obsessed with taking Gregg down at that 23 point. 24 Q. You called a staff meeting before 25 you made the phone call?</p>	<p>1 time that everything was going wrong with 2 my personal life. It would be like May, 3 April/May of 2018. 4 That was, you know, the 5 harassment I believe discussion we had. 6 Everybody gathered around. I think. I 7 don't even know who it was. It was Marc 8 Fink, maybe Gregg sat everybody down, hey, 9 you have been harassed, you know, say 10 something here. If you don't know who to 11 go to, go to Marnie. If you can't go to 12 Marnie, go to Marc. If you can't go to 13 Mark, go to Daniel. 14 Q. That happened in 2018? 15 A. Yeah. There was no way that 16 happened between the time of the November 17 meeting, by the time I left in March. I 18 mean it had to be 2018. 19 Q. Let's go back to the staff meeting 20 that you called. You said you thought it 21 was in January 2019 or sometime thereafter. 22 A. December, January, February. I 23 believe after New Years. I would put it 24 like January, February. 25 Q. So you called that meeting to</p>

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<p>1 discuss harassment regarding Gregg Roman, 2 right?</p> <p>3 A. No. I called the meeting so that 4 everybody would see Gregg is gone, I mean, 5 that was -- we don't have to talk about 6 Gregg anymore. We don't have to worry 7 about Gregg anymore. We can go back to 8 work, trying to be a team. I had started 9 to conceive ideas for the organization, how 10 to improve its efficiency. I liked the 11 idea of moving things to the cloud and 12 basically making everything more simple, 13 cohesive, fluent.</p> <p>14 And I had like a big white 15 board in my office. I was listing all the 16 dozens of things and different projects 17 that I was aiming to tackle. And it was 18 like this issue of like, well, Gregg is 19 still around.</p> <p>20 I was upset, you know, I was 21 upset as well, knowing everybody else was 22 upset and thinking that -- you know, the 23 way it made me feel was, well, Matt, we 24 can't trust you because you are friends 25 with Gregg, and you will always be friends</p>	<p>1 you have to -- you have to have the 2 following of a team in order, in order to 3 lead it. So if not, then you are not going 4 to accomplish very much. So I tried to 5 gain their confidence in me.</p> <p>6 Q. Was it because Gregg Roman was not 7 following the rules and contacting people?</p> <p>8 A. I don't really remember what the 9 rules were. I think it was only e-mail. I 10 mean no phone. I think text was okay, 11 maybe. I don't know. Maybe somebody had 12 said that he had, he had spoken to them.</p> <p>13 It would be like, you know, 14 like Matt, Gregg is bothering me with phone 15 calls, so I put an end to the phone calls. 16 That was, like that was my -- that was the 17 aim.</p> <p>18 Q. What was the date, what was your 19 final date of employment with the Middle 20 East Forum?</p> <p>21 A. March either like 7, 8, 9, 22 something like that.</p> <p>23 Q. You said March 2019?</p> <p>24 A. Yeah.</p> <p>25 MR. GOLD: Hey, Seth -- this is</p>
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<p>1 with Gregg, and we will never be able to 2 trust you. So I tried to earn back their 3 trust. I tried to position myself so that 4 they would see, like, alright, Matt is on 5 our side.</p> <p>6 Q. But by January 2018, Gregg had been 7 gone for two months by that point, correct?</p> <p>8 A. In January, yes. I guess November, 9 December, yeah.</p> <p>10 Q. So I guess my question, so why did 11 you call this staff meeting at that time, 12 to tell, so you could show everyone that 13 you were going to call Gregg and tell him 14 not to contact everyone?</p> <p>15 A. I guess for a number of reasons. 16 There was the -- I guess everybody just 17 sort of wanted him gone at that point, just 18 thinking that, like, all right, this is a 19 bad thing that's happened to the 20 organization, let's just get past it and 21 move forward.</p> <p>22 You know, in the absence of 23 Gregg, started to think, well, maybe I 24 could be the director. Then I started to 25 conceive all these ideas. So, you know,</p>	<p>1 Dave, Eleanor -- I just wanted to 2 interject, I have to run to another call. 3 I just wanted to let the court reporter 4 know that I am jumping off the record, for 5 purposes of the record. Leigh Ann Benson 6 from Cozen O'Connor is still on the call 7 and she will be taking my place. Okay, 8 Seth?</p> <p>9 MR. CARSON: Yes.</p> <p>10 MR. WALTON: I might jump back 11 in at some point. Sorry to interrupt you.</p> <p>12 MR. CARSON: No problem.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. At some point in time did you ever 15 become aware of Gregg returning as the 16 director of the Middle East Forum or the 17 rules, the rules that were put in place of 18 being lifted?</p> <p>19 A. Yeah, around the time about that I 20 left. I mean, I don't know if rule -- I 21 don't know what rules were lifted or what 22 the arrangement was. But I think for a 23 time things went back to normal, as far as 24 I know.</p> <p>25 I don't know. I exchanged</p>

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<p>1 messages with Tricia and Lisa after I left 2 in March and April. They were still 3 working. I think they had taken on -- it 4 was a heavy workload. They both expressed 5 interest in, you know, in working with me 6 at ZOA. I didn't have the go-ahead to hire 7 there until, you know, later on. But I 8 still had conversations with them in the 9 weeks or, I don't know however many weeks 10 it was before suddenly I was un-friended 11 and whatever.</p>	<p>1 me to finish out what I was doing. And 2 they allowed me to finish out what I was 3 doing. 4 They handed off everything to 5 Marnie, IT, controls, passwords to 6 different accounts. Basically everything 7 that was on my desk I had to get off of my 8 desk to make sure like a smooth transition. 9 So that was taking place.</p>
<p>12 Q. Did you facilitate Gregg's return 13 in any way?</p>	<p>10 There was a vote, maybe a few 11 days before I left, where everybody except 12 for myself was able to vote for who should 13 lead the office. And I believe everyone</p>
<p>14 A. I don't know how I could facilitate 15 his return as a non employee or an 16 ex-employee.</p>	<p>14 voted for Lisa, and Marnie voted for 15 herself. And they told me that. I 16 remember thinking that, well, you know,</p>
<p>17 Q. Well, I think Lisa testified that, 18 if she is wrong, you should say so --</p>	<p>17 that's going to be it. Marnie I saw as the 18 person who summoned me to Starbucks, wrote 19 the letter, undermined me or was -- I don't</p>
<p>19 A. Yeah.</p>	<p>19 know. She would tell me: Well, Lisa and 20 Tricia don't really want you to hang out</p>
<p>20 Q. -- that you set up a phone call 21 between her and Gregg. Do you remember 22 that?</p>	<p>20 with them when they go out after work. 21 They are trying to pick up guys, and, you 22 know, it is weird if a guy is with them.</p>
<p>23 A. Actually, I do remember that. She 24 said she was interested in -- she said: We 25 need a leader, or something like that. And</p>	<p>23 So when I confronted them with</p>
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<p>1 so, I mean, unrelated to this is that, you 2 know, I believed that at that time that 3 Marnie was, whether or not it is the case 4 or not the case, I felt at that time was 5 destroying the organization from the 6 inside, and it had come to my attention 7 that she tried to undermine me, or made me 8 look bad, or said she refused to report to 9 me, or refused to work for me ever, around 10 the same time asking me, well, do you think 11 I could be director of the organization.</p>	<p>1 that, Marnie said you guys really don't 2 want me hanging out with you at all, they 3 said: Why would she say that? That's 4 ridiculous, etcetera. 5 So things started to add up in 6 my mind that Marnie was two-faced or 7 manipulating people. And I saw, you know, 8 the safety of everybody's jobs and the 9 future of the organization and the 10 cohesiveness or the ability to carry out 11 the mission lied in Gregg, since they had 12 told Daniel that they had no problem with 13 Gregg, that Matt was the one who was 14 illogically obsessed with removing him.</p>
<p>12 So I started to think that 13 maybe she just resented the idea that I 14 thought I would be director of the 15 organization.</p>	<p>15 That that was the answer to 16 their, you know, to their problem of 17 Marnie. They at some point -- I don't 18 know. Like saga between Marnie and Lisa, I 19 really don't understand. But, you know, I 20 know that -- I don't know. They voted, 21 they all voted for Lisa, Marnie voted for 22 herself. She thought that somehow that was 23 malicious, Lisa did something malicious. I 24 don't know.</p>
<p>16 Q. This is Marnie or Lisa you are 17 talking about?</p>	<p>16 Q. I guess what I was referring to is</p>
<p>18 A. This is Marnie. But this is, my 19 answer to the question is based on the fact 20 that there was some kind of, after I 21 announced, I'm resigning, I'm leaving, my 22 final day will be, I don't know if I gave 23 the date, March the 7th or 8th, whatever, 24 you know, I expected that they would just 25 ask me to leave the next day or just allow</p>	

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<p>1 before Gregg came back, I heard an 2 allegation that you set up a phone call 3 between Gregg and Lisa to talk about his 4 return as director. Do you remember that, 5 or did that happen? 6 A. Yeah. Yeah, it was a phone call, 7 yeah. 8 Q. So you and Gregg and Lisa were all 9 on that call? 10 A. Yep. 11 Q. And what was said during that call 12 that you remember? 13 A. I think it was just them talking, 14 mostly. I was just sort of the one who was 15 like, all right, Gregg, you know, will talk 16 if you want to talk to him. 17 I had somewhat made up with 18 Gregg by that point, or we had started to 19 try to like repair what was -- actually, 20 I'm not even sure when that phone call was. 21 But it was after he came to my house one 22 day to return an iPad or to provide the 23 iPad that we had used to record some 24 videos. 25 But it was pretty much Gregg</p>	<p>1 what was -- you know, at the November 5th 2 meeting, Gregg wasn't to be there 3 physically, just to, you know, use digital 4 means of communication, to work on the 5 portfolio that would still remain on his 6 desk. 7 And after I left, I'm not sure 8 if he was permitted to come back or it was 9 an arrangement or whatever. But I know he 10 was still -- I checked the website. He was 11 still working there or the website still 12 listed him, anyway, so... 13 Q. Were you asked to sign a 14 nondisclosure agreement before the November 15 4th, 2018 meeting? 16 A. I signed a nondisclosure agreement 17 when I was hired. Maybe people who didn't 18 have a nondisclosure agreement in place or 19 something. I had, when I was hired I had 20 signed everything. I don't know if it was 21 like everybody had to. 22 I think I remember signing -- 23 actually, I think I remember signing 24 something, but, I mean, I don't know if it 25 was like to state I would be in the meeting</p>
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<p>1 saying: I'm gone, like I have, like I have 2 another project underway, and I'm about to 3 like say goodbye and be out. 4 And then, you know, Lisa was -- 5 I don't remember exactly what was said. I 6 just remember the gist of it was that Gregg 7 was saying, look, I'm not telling Matt to 8 tell you to have me come back. Do you want 9 me to come back? Or etcetera. 10 And they made that -- they had 11 that discussion on their own. I remember 12 my wife kept calling me, because there was 13 something going on, and she was, like, you 14 know, get off the phone. I think we had to 15 go somewhere. So switching back and forth 16 on the line. 17 Q. So after that call it was then 18 Gregg Roman returns as director of the 19 Middle East Forum? 20 A. I have -- he was never not 21 director, as far as I guess I understand. 22 I mean, he was always still director. It 23 was just what he was doing as director, not 24 being in the office, not managing certain 25 aspects of the business. So I don't know</p>	<p>1 or just as a regular nondisclosure 2 agreement. But I already had nondisclosure 3 agreements throughout my employment or from 4 the beginning, from day one of my 5 employment, before I even interviewed I 6 signed a nondisclosure agreement to say 7 where was the office or where the location, 8 the employees, etcetera. 9 Q. So do you remember being asked to 10 sign another NDA before the November 4th, 11 2018 meeting? 12 A. Could be. November 2nd was my 13 mother's birthday and we celebrated her 14 birthday, and it was like everything 15 exploded right around that time. I just 16 remember being in the meeting. I can't 17 remember. The day before, two days before. 18 November 2nd was her birthday. November 19 5th I believe was the meeting. I don't 20 know if I signed something in between. 21 Q. Did you have a problem with signing 22 another NDA? 23 A. I mean, if I did it was obviously 24 there. 25 Q. Did you have a problem, were you</p>

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<p>1 concerned about signing that NDA before the 2 meeting?</p> <p>3 A. I never had any problems with 4 signing anything with the organization.</p> <p>5 Q. You weren't worried about whether 6 the NDA would protect you?</p> <p>7 A. Would protect me?</p> <p>8 Q. Right.</p> <p>9 A. Well, I can only assume if you are 10 asking these questions that there is an NDA 11 that you are speaking of.</p> <p>12 Q. Well, I'll represent to you I have 13 been given NDAs that were dated within days 14 before the meeting in discovery.</p> <p>15 A. Okay.</p> <p>16 Q. So I think that you guys, I'll 17 represent to you that it appears that you 18 were asked to sign the NDA before the 19 meeting.</p> <p>20 A. Well, then, I signed one.</p> <p>21 Q. But I'm asking --</p> <p>22 A. I'm sure you have it.</p> <p>23 Q. My question was about your concern. 24 Were you concerned, did you have a problem 25 with being asked to sign an NDA before a</p>	<p>1 to take that very seriously.</p> <p>2 I was worried, being a 3 homeowner, that, you know, somebody would 4 easily be able to figure out where I live. 5 I would receive postcards, you know, in the 6 mail from nut jobs, with my name on it, 7 took the time to have a picture of an 8 Israeli tank bulldozing a Palestinian home, 9 as if to imply that I am responsible for 10 something.</p> <p>11 And my fear was like, well, 12 some nut job was deliberate enough to 13 create a postcard and know my name, then he 14 could be deliberate enough to come after me 15 or my family.</p> <p>16 So I was glad that there were 17 NDAs in place. I was glad we had security 18 protocols that would prevent such a thing 19 from taking place.</p> <p>20 Q. So when Gregg returned to the 21 Middle East Forum, by return, I guess I 22 don't want to put words in your mouth, what 23 I mean is can we agree sometime around 24 March 2019 Gregg was brought back to the 25 Middle East Forum in the capacity that</p>
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<p>1 meeting that was being held to discuss a 2 letter that alleged sexual harassment?</p> <p>3 A. It was possible I was confused 4 about the letter. I really didn't know 5 what implications there were or what was 6 going to come down. I mean, to be honest, 7 I don't put any -- I don't think -- protect 8 me from what?</p> <p>9 My concern was losing my job, 10 not being able to pay my mortgage and 11 provide, you know, a life for my family. 12 That was my main concern. I don't think 13 the NDA is going to protect me from that. 14 So, no, I wasn't -- sign this piece of 15 paper, whatever, you know. I don't 16 remember what the NDA said. If you tell me 17 you have one with my name on it, that was 18 signed on, around in that time.</p> <p>19 I just know that I had signed 20 nondisclosure agreements with the 21 organization upon hire due to the nature of 22 the work, you know, could threaten me by, 23 Islamic sympathizers, Jihadist 24 organizations, etcetera, what the location, 25 about the location of the office. We had</p>	<p>1 changed the rules and the guidelines that 2 were set in place at the November 4th, 2018 3 meeting? If that statement is incorrect, 4 please correct me.</p> <p>5 A. I'll just put it this way: The 6 conclusion of the November meeting was that 7 Gregg can't come into the office. He can 8 do his work by interacting, with e-mail and 9 phone or text or whatever. Whatever one of 10 those things wasn't allowed, I believe it 11 may be phone or may be text.</p> <p>12 I don't know who was 13 complaining. Tricia or, Tricia or Catriona 14 said they got a phone call and Gregg asked 15 them to do some assignment, and they were 16 bothered, I don't know by the assignment 17 itself maybe or by Gregg. But I just saw 18 it as, all right, I'll put an end to that. 19 And I tried to do that in that meeting that 20 I told you that I had called.</p> <p>21 So I don't know exactly what 22 was reinstated, either phone calls or in 23 person, whatever. No one ever told me 24 that, that he was either back in the office 25 or back allowed to call, because I don't</p>

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<p>1 recall what was -- he was prevented from 2 doing. I just remember that when I tried 3 to prevent him or when I tried to make sure 4 that he wouldn't be contacting the women in 5 the office, they all said, well, that's -- 6 you know, Matt didn't need to do that, like 7 we are perfectly capable of handling our 8 own business, and made me look like a dope. 9 Q. So when I say return to MEF, I mean 10 in March of 2019, when he was permitted to 11 come back in some increased capacity, is 12 that fair to say? You used the phrase -- 13 A. I can't say it. 14 Q. You understand that -- 15 A. No. 16 Q. So you are not adopting the 17 language. I just want to be able to ask 18 this question. Were you employed with MEF 19 still when Gregg returned to MEF in March 20 of 2019? 21 A. No. 22 Q. So during that phone call you 23 testified about that you kind of set up 24 between Gregg and Lisa, were you employed 25 with MEF then?</p>	<p>1 quick? Like 90 seconds. 2 Q. Absolutely. 3 A. I don't want to keep pausing things 4 up. 5 MR. CARSON: We will do five 6 minutes. We will go off the record for 7 five minutes. 8 THE WITNESS: All right. 9 Thanks. 10 THE VIDEO SPECIALIST: We are 11 off the record. 12 (Recess taken.) 13 THE VIDEO SPECIALIST: We are 14 back on the record. 15 BY MR. CARSON: 16 Q. All right. So the first exhibit 17 I'm going to put in front of you is the 18 complaint, and this is the last complaint 19 that was filed. I'll going to do the 20 screen share, and then one of these. 21 Screen share. So this is a copy of the 22 complaint. You can see it is docketed. 23 And so this is the complaint filed in 24 Lisa's case. 25 I'll represent to you this</p>
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<p>1 A. Yes, I believe so. I mean -- yeah, 2 yeah. I don't know how it could take place 3 after. Maybe -- actually, maybe it did 4 take place after. 5 No, it wouldn't make sense. 6 No. It was before. It was probably 7 before. So I guess the answer is I don't 8 know. 9 Q. Did Gregg ask you to set up that 10 phone call? 11 A. No. 12 Q. To set up that phone call? 13 A. He repeatedly said on the phone, "I 14 didn't ask for this." He said, "I'm 15 already out." He said I got -- the reason, 16 he had another initiative, which in my view 17 it seemed like more exciting, had more of 18 the ability to influence policy, you know, 19 to achieve the objectives that the (c)(3) 20 would be set out to do. And he was going 21 to be on his way. At least that's as far 22 as I understood it. 23 Q. All right. So I guess the first 24 thing I want to do is this -- 25 A. Mind if I run to the bathroom real</p>	<p>1 complaint includes every allegation from 2 the first complaint that was filed to the 3 last complaint that was filed, which is 4 this one, that's ever been filed in this 5 case. 6 And I don't know if there is a 7 way to hand him over access so he can 8 scroll through this on his own measure. 9 But earlier today you testified that at one 10 time you believed that the allegations that 11 Lisa and Tricia made regarding Gregg Roman 12 were true, and that you today don't believe 13 those allegations because, because of 14 things you read in complaint that you know 15 aren't true; is that right? 16 A. Well, the mere fact that they deem 17 me enemy of the state, un-friended me, 18 yeah, said that -- yeah, I mean, yeah, I 19 don't believe that -- it is hard for me to 20 believe anything that they say if there is 21 things that I question that they are saying 22 now. 23 Q. What do you question that they are 24 saying now? 25 A. Quid pro quo, that I was -- that I</p>

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<p>1 received, that I was given a complaint and 2 didn't pass it on, or that like they 3 reported it to me and I ignored it or 4 something, that they felt uncomfortable in 5 any way by me, knowing that they were 6 friends until the date that I left, 7 remained friends afterwards when they 8 expressed an interest in coming to work 9 with me at ZOA, Tricia and Lisa meaning, 10 when Catriona and Delaney wanted to rent my 11 house when I let them know that I would be 12 moving.</p> <p>13 So taking things that had 14 happened a year ago or months ago and then 15 suddenly, well, those things are a problem 16 now. It is just, I don't see the honesty 17 in that. Why continue conversations with 18 me after I left? Why say you wanted to 19 work with me? Either I was being baited 20 and trapped, or just lying the entire time, 21 or they were never my friend.</p> <p>22 Why organize a going away lunch 23 for me, and order cocktails, and have 24 everyone smiling for a picture? What is 25 the point of that?</p>	<p>1 Q. Well, I wasn't going to bring it up 2 today because I think we are going to do 3 another deposition in the matter of 4 Patricia McNulty versus Middle East Forum, 5 Daniel Pipes, Gregg Roman and you. 6 However, since you just brought it up, I'm 7 going to ask a couple of questions about 8 it, and I'll try to ask as few questions 9 about this as I can.</p> <p>10 So you mentioned that one of 11 the things that you, one of the reasons, 12 one of the things that changed your mind, 13 you said the quid pro quo; is that correct?</p> <p>14 A. Yeah, yeah. Or the whole idea that 15 I was somehow a nuisance or anything other 16 than a friend and a mentor.</p> <p>17 So I may have professed 18 feelings. But never overstepped 19 physically, verbally. I was always careful 20 to say, hey, should I not say that, is that 21 bothersome. I always received the, no, 22 that doesn't bother me, you could never 23 bother me. Does that answer your question?</p> <p>24 Q. Well, my question was: You said 25 the quid pro quo, correct?</p>
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<p>1 So that I wouldn't see a 2 complaint coming later on down the line. 3 Like I just, I don't know. Either at some 4 point they decided to do it, all this, 5 concocted it while I was still there and 6 manipulating me to their advantage, or they 7 decided after the fact that they -- that 8 something went wrong and then I was 9 suddenly a scapegoat or whatever.</p> <p>10 So that's it. You know, there 11 was a, why tell Daniel that they didn't 12 have a problem with Gregg calling them and 13 interacting with them after they told me 14 that they did, only to make me look stupid 15 or seem crazy for it.</p> <p>16 I don't know what it all adds 17 up to mean. I don't know if they woke up 18 one day and suddenly said, yeah, I feel 19 like I was offended by this and now I'm 20 going to throw everything at the wall, and 21 I'm included in that. So I don't know.</p> <p>22 I don't know if you want to 23 start going through the document like and 24 instead of have me guess at it. That seems 25 better.</p>	<p>1 A. Yeah. Well, I saw those words and 2 thought how could, how could anybody even 3 -- how could anybody ever do that to 4 somebody, especially --</p> <p>5 Q. And quid pro quo was something 6 specific that is relegated to Patricia 7 McNulty's case, are you aware of that?</p> <p>8 A. Yeah, it was in the packet that you 9 had delivered to my apartment, I guess, or 10 whatever.</p> <p>11 Q. Patricia McNulty alleged quid pro 12 quo sexual harassment with regard to you, 13 right?</p> <p>14 A. I believe so. I mean unless I am 15 mistaken, mistook what I read or don't 16 understand correctly. Just, I don't know 17 what I'm guessing at here.</p> <p>18 Q. Well, did you ever sexually harass 19 Patricia McNulty?</p> <p>20 A. No.</p> <p>21 Q. What is your definition of sexual 22 harassment?</p> <p>23 A. Unwanted advances.</p> <p>24 Q. Well, did you ever say anything 25 sexually inappropriate to Patricia McNulty?</p>

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1 A. Explicitly, no. I, I introduced
2 the idea of sharing a room. I sent YouTube
3 videos of songs that came out when I was in
4 high school or middle school, like love
5 song type things. That was the extent of
6 it. She told me intimate details about her
7 life. I told her intimate details about
8 mine.

9 Q. When you asked Patricia to share a
10 hotel room with her, what did she say? I
11 mean, you did that, right? You asked her
12 to share a hotel room with you, correct?

13 A. Yeah, I said, "Do you want to?"
14 And she basically said no. And that was
15 it.

16 Q. Well, why did you want to share a
17 hotel room with her?

18 A. I felt close to her. I was -- she
19 was the first person I told when we found
20 out we were having a baby. She was the
21 first person I told we lost the baby. We
22 hung out, all of us as a group, multiple
23 locations.

24 We would -- I would teach her
25 how to -- I taught her everything I knew.

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1 I was trying to -- you know, she turned out
2 to be a, what I felt was a great worker. I
3 thought she could take on more
4 responsibility. I started teaching her
5 more of what I knew. We kept going out,
6 all of us as a group, sometimes alone.

7 Said she wanted to learn how to
8 play poker. I said I would teach her. So,
9 yeah, I thought we were -- you know, I was
10 struggling personally with a lot of stuff.
11 I don't know if you have ever lost a child,
12 but I wasn't prepared for it. Started
13 drinking. My home life was a wreck. So
14 the one person or the only place that I was
15 able to feel that I was -- I could control
16 the situation or had a good environment was
17 at work. I tried to stay there longer than
18 possible instead of eager to get out the
19 door.

20 And, you know, I guess that was
21 it. We would talk about all kinds of
22 stuff. She would share intimate details of
23 her life with me, and I shared intimate
24 details of my life with her.

25 Q. You were her supervisor when you

1 shared those details, correct?

2 A. I don't believe so. I mean I'm not
3 sure when the -- what details these are
4 that specifically that you want to know
5 about. But I'm not -- the date that I
6 basically became no one's supervisor was I
7 guess some point in November, when
8 everybody just reported directly to Daniel.

9 Q. Well, did you ever insinuate to
10 Patricia that if she sticks by you or
11 engages in this relationship with you that
12 it will be good for her career?

13 A. What relationship?

14 Q. Romantic relationship?

15 A. We never had one.

16 Q. But you wanted to have one with
17 her, right?

18 A. Yeah. She would drop hints
19 sometimes, and I thought -- you know, I'm
20 not Rico Suave. I don't know. I have
21 never been that type of person. So I
22 thought, oh, maybe she wants me to take a
23 step forward, so I would do that. She
24 would say: Oh, it doesn't bother me. And
25 I would say: Oh, maybe I didn't take a big

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1 enough step forward.

2 Q. And I don't want to -- I'm sorry, I
3 don't want to embarrass you. I really
4 don't. But I guess what I'm trying to get
5 to is that --

6 A. It is all right. It is what it is.

7 Q. Maybe there is some truth in her
8 allegations, is what I'm suggesting. Can
9 you see that?

10 A. No, I can't. I asked verbally
11 multiple times: Do you want me to not send
12 this? Should I not say that? Do we not
13 want to hang out or do something?

14 It was always, no, you don't
15 bother me. She told me I was the best boss
16 she ever had, she appreciated I saw her
17 potential or give her credit.

18 Up until the day that I left I
19 was helping her write her resume. I said
20 if I went back to the IT sector and she
21 wanted to start a career in that, then I
22 would teach her everything I knew about
23 that as well. She was excited about that.

24 She said don't -- you are going
25 to leave me and MEF, or leave me in the

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<p>1 lurch at MEF. If she was bothered by me, 2 celebrating my departure, or at least just 3 cut off all communication the official date 4 that I left. But that didn't happen. 5 So from my point of view, yeah, 6 it seems like somebody went back to find 7 everything they could to make me look like 8 a jerk-off, as an aggressor, and as this 9 bad person. And during my time I was 10 anything but. 11 They were -- they all told -- 12 messages from Catriona telling me I was the 13 best boss she ever had, she was going to 14 miss me, wanted to rent my house. 15 Lisa and Tricia both were 16 interested, oh, ZOA, or how is ZOA, do they 17 need anybody at ZOA, etcetera. 18 So I don't, I don't -- I can't 19 tell you what, why their actions are one, 20 were one way prior to my leaving and then 21 even after my leaving, and then all of a 22 sudden flipped everything upside-down. 23 Q. You felt betrayed? 24 A. Felt betrayed. I mean, I just, I 25 didn't understand, and I still don't</p>	<p>1 BY MR. CARSON: 2 Q. So I guess with regard to Lisa's 3 case, so like all the things you mentioned, 4 correct me if I'm wrong, seem to relate to 5 the allegations Ms. McNulty made. Are you 6 aware of any allegations Lisa ever made 7 that aren't true? 8 A. Those were the most alarming ones. 9 But just the mere fact to name me as a 10 defendant. I don't remember exactly, I'm 11 pretty sure she is saying, yes, she 12 reported to me that, you know, something to 13 me that I was like negligent or 14 irresponsible or didn't report it. 15 And here I believe you are 16 referring to the AIPAC or the Israel trip, 17 when she said: Gregg is a dork. I'm not a 18 me too girl. At no time did anybody ever 19 say, Matt, like I have a serious issue and 20 I want to make a complaint. 21 Q. I mean, I just hit a search, so 22 right now if you look, do you see what I'm 23 doing here? 24 A. Yeah, yeah, I'm following. 25 Q. I'm searching for everywhere in</p>
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<p>1 understand. They could have, I don't know, 2 approached me and said: Do you know you 3 made me feel that way? Or do you know that 4 we think this? Or whatever. Never did 5 that. 6 Q. I don't want to ask you too many 7 questions. You are a defendant in those 8 other cases. Your lawyers are on the call. 9 And I don't know if they prepared you for 10 testimony in that case. So I'm trying to 11 limit my questions in that case. 12 A. I thought you said I was not a 13 defendant. 14 Q. In Lisa's case you are not. But in 15 Patricia's case you are. And so I want to 16 give your lawyers a fair opportunity to 17 prepare you before you get questioned about 18 a case. I'm trying to limit those 19 questions. 20 A. Okay. 21 MR. GOLD: For the record, we 22 intend it to be, this deposition to be 23 limited to this case only. 24 MR. CARSON: Yeah, that's what 25 I'm trying to do.</p>	<p>1 this complaint where your name is listed. 2 A. All right. 3 Q. So No. 5 says you are an adult 4 individual and you reside for the purposes 5 of service at this address, which is just 6 the MEF work address. 7 A. Yep, yep. 8 Q. No. 6 says: At all times material 9 this action, defendant Gregg Roman, 10 defendant Matthew Bennett, and defendant 11 Daniel Pipes aided and abetted under 12 discrimination and harassment and 13 retaliation in the workplace to which 14 plaintiff was subjected by defendants. 15 You know, I guess -- I'm not 16 going to do that. 17 Q. Let me do this. Do you want to 18 take time to look at this document anymore? 19 I want to give you an opportunity. I 20 didn't really scroll through it. 21 A. No. Show it to me on the spot. 22 I'll tell you exactly as I remember why, if 23 it is a ridiculous statement, I'll tell you 24 why it is ridiculous. 25 MR. GOLD: I don't think the</p>

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<p>1 witness had a chance. Why don't we take 2 ten minutes and let the witness actually 3 read this complaint. 4 MR. CARSON: Do you want me to 5 e-mail this to him or something like that? 6 MR. GOLD: That would be good, 7 yes. 8 MR. CARSON: All right. Just 9 let me, Matt, can you just give me an 10 e-mail address, and I'll e-mail it to you 11 and Sidney at the same time. 12 THE WITNESS: We are copied on 13 the e-mails from this morning. 14 MR. CARSON: I don't think I 15 have that. 16 THE WITNESS: It is my name at 17 gmail.com. Mattpbennett@gmail.com. 18 MR. CARSON: M-A-T-T-H-E-W? 19 THE WITNESS: No, just Matt, 20 the letter P, Bennett, with two Ns, 2 Ts, 21 @gmail.com. 22 MR. CARSON: M-A-T-P, as in 23 Paul, B-E-N-N-E-T-T @gmail? 24 THE WITNESS: 25 M-A-T-T-P-B-E-N-N-E-T-T.</p>	<p>1 you said the reason, one of the reasons you 2 don't believe they are true is because of 3 things you read in the complaint you knew 4 not to be true. 5 A. Well, the document I'm looking at 6 now is not the document that I saw 7 initially. And I believe, if I'm not 8 mistaken, there is -- I mean, I don't 9 understand why this document is different 10 or would have different content. 11 It seems like you, with all due 12 respect, put everything in there, a lot of 13 which I believe to be lies about myself. I 14 don't know what updated documents there 15 are. But I've obviously never seen this 16 one. I'm reading through it now. But I 17 don't understand why there would be things 18 in an original document that's not in this 19 document. Seems like you are trying to, I 20 don't know, catch me into say, well, like 21 you read something in the document, but now 22 that document is no longer relevant, this 23 is the relevant document. And it only says 24 this and this. 25 Q. I'll represent to you that there is</p>
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<p>1 MR. CARSON: I'm sorry. I 2 actually do have it. And then Sid. 3 MR. GOLD: 4 Sgold@discrimlaw.net. 5 MR. CARSON: All right. All 6 right. I just e-mailed to you guys. Just 7 take a minute and look through it. I want 8 to give you an opportunity to actually 9 address the document. 10 THE VIDEO SPECIALIST: We are 11 off the record. 12 MR. CARSON: That's fine. 13 (Recess taken.) 14 BY MR. CARSON: 15 Q. So point of doing that was just 16 because I wanted to give you an opportunity 17 to say whether there was anything specific 18 in that complaint that caused you to change 19 your mind. 20 A. To change my mind about what? 21 Q. Well, I think at some point in time 22 you believed that the allegations that 23 Patricia McNulty and Lisa Barbounis leveled 24 against Gregg Roman were true, and you 25 don't believe they are true, and I think</p>	<p>1 no allegation -- 2 A. I don't understand. Is this the 3 original thing that I received? Or is this 4 the current complaint? 5 Q. It is the current complaint. And 6 the law is, which you might not realize, 7 and you don't have to, is when you file a 8 new complaint it supplants the old 9 complaint. So that's the complaint that 10 everyone is working on today. 11 A. Well -- 12 Q. I would be happy to show you the 13 original complaint that was filed. I don't 14 think there was any allegations concerning 15 you in this complaint that are -- 16 A. I'm not going to go dig up a 17 document and then do a comparative analysis 18 to this one. But scrolling through it, I 19 mean, to see that like Lara and Laura were 20 terminated because they were discriminated 21 against, they were incompetent. I 22 demonstrated, I have direct knowledge of 23 their incompetency. 24 Eman was -- Marnie constantly 25 saying Eman is not working in her office,</p>

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1 she is doing nothing, somebody needs to
2 keep track of her time better. We started
3 keeping track of her time more.

4 Rosy was discriminated against.
5 Rosy also reported under me. I know she
6 didn't want to be Gregg's assistant,
7 because I was Gregg's assistant. It was
8 the heaviest workload in the organization
9 to be Gregg's assistant. Coordinate
10 hundreds of meetings, do follow-up notes.
11 I mean, it is the most demanding job there
12 is to have -- to be running after, to make
13 sure that all the details are taken care
14 of, from soup to nuts.

15 So I don't, I don't understand
16 how it seems like that is bundled in, you
17 know, Lara, Laura.

18 Samantha Mandeles, I mean, even
19 though she wasn't even in the office, I
20 don't know how she was discriminated
21 against. You know, it seems that -- like
22 it is a 70-page document that I'm seeing
23 for the first time.

24 Rosy didn't want to work for
25 Gregg. Okay. Eman, that was -- Eman had

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1 her own thing she was trying to do. She
2 had another nonprofit where she had a vegan
3 company, where she was selling vegan food
4 or something. You know, I don't think she
5 -- I don't even remember her to be
6 terminated. I believe she left. The
7 uncomfortable work environment was just a
8 heavier workload, you know, which I as the
9 manager was asked to, you know, can you
10 keep track of the time of the people that
11 are reporting to you, do you know what they
12 are doing all day long.

13 I'm still scrolling. So, is
14 there a question? Do you want me to
15 comment on something?

16 Q. Yeah. You never texted Lisa about
17 Lara and said that Gregg did the same thing
18 with Lara that she was doing to her?

19 A. Which was what?

20 Q. Subjecting her to sexual
21 harassment?

22 A. To sexual harassment? So, so that
23 implies that Gregg was sexually harassing
24 Lara, and that I had knowledge of it, and
25 that I saw Gregg sexually harassing Lisa,

1 and that, and that I knew about it and
2 wasn't doing anything, but was telling Lisa
3 that she was being sexually harassed.

4 Q. At the time you believed Lisa when
5 she told you that she was sexually
6 harassed, right?

7 A. She had told me that she came back
8 from Israel, Gregg was being a dork. At
9 some point she showed me the screen shots
10 of the messages that she had sent, I
11 believe to Tricia, and saying delete these
12 messages, and then somehow they had them
13 and were shown to me.

14 So, you know, when the time
15 came when it was like, well, it was
16 actually more than Gregg being a dork on
17 the couch, and then Tricia said, oh, also
18 something happened at AIPAC, then it
19 started to build up.

20 And then Marnie saying that,
21 oh, or Gregg wanted me to sleep with him,
22 but I said no, on the Israel trip, which is
23 mentioned in here.

24 I mean it is just -- that's not
25 how I remembered things. It is not the

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1 narrative that's in my mind of how things
2 happened leading up to everything. Like
3 for me to, so for me to see stuff like that
4 among other things that I have no knowledge
5 of, then, then, yeah, I have to be able --
6 then I cast doubt. And that's the basis of
7 me casting doubt, because that...

8 Q. What about, something else, is that
9 your phone number right there?

10 A. Yeah, it was.

11 Q. Do you remember sending this text
12 message before the D Day meeting?

13 A. November 4th, 2018. I mean, I
14 can't comment on this without seeing, like,
15 is there -- I mean was it an e-mail? Was
16 it --

17 Q. This is a text message. This was
18 produced by Cornerstone as part of
19 production that came from Lisa Barbounis.
20 I believe it is a thread between you and
21 Lisa.

22 A. All right. Can I see the thread?
23 Is there metadata where, like something
24 showing the --

25 Q. If your lawyer doesn't have

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<p>1 objection to it, I can show you context. I</p> <p>2 actually have it and I'm happy to provide</p> <p>3 context for the defendants too, if they</p> <p>4 need it, in certain messages that were</p> <p>5 produced in the past. But --</p> <p>6 A. So what is the question?</p> <p>7 Q. The question is: You sent this</p> <p>8 text message to Lisa, correct?</p> <p>9 MR. WALTON: Hey, Seth, I'm</p> <p>10 sorry to interrupt you. I just wanted to</p> <p>11 let Eleanor know I'm back. This is David,</p> <p>12 for the record. Sorry to interrupt.</p> <p>13 Q. I guess the question I have is, you</p> <p>14 know, if the first time you ever heard the</p> <p>15 allegations of sexual harassment regarding</p> <p>16 Gregg was at the D Day meeting, then why</p> <p>17 are you talking about Gregg throwing his</p> <p>18 dick around before the meeting?</p> <p>19 A. I, I don't know -- number one, I</p> <p>20 don't recall sending this message. But if</p> <p>21 you are saying that it exists, or that you</p> <p>22 have some, whatever company did a data</p> <p>23 extraction, then, then I have no choice but</p> <p>24 to believe you that it exists, obviously.</p> <p>25 And before Daniel holds a</p>	<p>1 A. Who did they report it to?</p> <p>2 Q. I'll ask you this question: Why</p> <p>3 does it matter?</p> <p>4 A. Well, there is -- I'm telling you</p> <p>5 that what was said to me or in my presence</p> <p>6 was prior to the letter being sent, which</p> <p>7 whatever date that was, because everything</p> <p>8 was like small beans, and all of a sudden</p> <p>9 there is a giant beanstalk with sexual</p> <p>10 allegations raising into the cloud as soon</p> <p>11 as it got serious.</p> <p>12 So what you are calling a</p> <p>13 report, I'm calling just somebody</p> <p>14 mentioning around the office.</p> <p>15 I don't know what the question</p> <p>16 is here. You are saying did I know of</p> <p>17 reports of harassment? No, no.</p> <p>18 Q. Throughout your entire career at</p> <p>19 the Middle East Forum you were well aware</p> <p>20 of Gregg Roman's inappropriate sexual</p> <p>21 misconduct toward women, right?</p> <p>22 A. What women? Like I have gone case</p> <p>23 by case with each one, and I have told you</p> <p>24 who was -- who left for what reasons of</p> <p>25 incompetency which were demonstrated in</p>
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<p>1 meeting and starts talking about Gregg --</p> <p>2 your question is if I learned about it on</p> <p>3 November the 5th, how did I send it on</p> <p>4 November the 4th?</p> <p>5 Q. Yeah. My point is, you knew that</p> <p>6 the D Day meeting was going to be about</p> <p>7 allegations of sexual harassment, correct?</p> <p>8 A. Well, yeah. Everything went down</p> <p>9 on November the, before that, November the</p> <p>10 1st, I guess, or October -- at the end of</p> <p>11 October.</p> <p>12 Q. So you were aware of reports of</p> <p>13 sexual harassment that were made during</p> <p>14 your employment, right?</p> <p>15 A. No. Again, there was never a</p> <p>16 report made to me about any sexual</p> <p>17 harassment.</p> <p>18 Q. It doesn't have to be to you. It</p> <p>19 could be in general. You were aware these</p> <p>20 women were reporting sexual harassment</p> <p>21 during their employment, correct?</p> <p>22 A. What women? And who was it</p> <p>23 reported to?</p> <p>24 Q. Lisa Barbounis and Patricia</p> <p>25 McNulty, at the very least?</p>	<p>1 their work product.</p> <p>2 In the aftermath of an</p> <p>3 employment, to say that there was</p> <p>4 harassment or whatever, discrimination, I</p> <p>5 don't know if in this document that you had</p> <p>6 me read says that they were discriminated</p> <p>7 against for being women. I don't -- I</p> <p>8 don't see any discrimination. I didn't see</p> <p>9 Gregg harass anybody.</p> <p>10 If anybody was harassed by</p> <p>11 Gregg it was me, being screamed at and</p> <p>12 belittled in front of all of the women, in</p> <p>13 Hebrew, in English, while I was home, while</p> <p>14 my wife was listening in the background. I</p> <p>15 got it worse from anybody, with the</p> <p>16 exception of maybe Gary, who was yelled at</p> <p>17 routinely, or Cliff in D.C., who Gregg</p> <p>18 would pick apart his work.</p> <p>19 If anything, he tiptoed around</p> <p>20 the women because he made -- like he, he</p> <p>21 was the director. It was his</p> <p>22 responsibility to make sure that that</p> <p>23 wasn't taking place on his watch.</p> <p>24 Q. He was highly respectful of women,</p> <p>25 is that your testimony?</p>

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<p>1 A. I don't know what highly 2 respectful, classifies as opening doors for 3 them? What? 4 Q. Throwing your dick in someone's, 5 around, is that highly respectful? 6 A. Respectable to whom and for what? 7 I'm not sure what the question is. 8 Q. Well, we do know that Gregg has 9 thrown his dick around, right? We know 10 that now, sitting here today? 11 A. Well, on November the 4th, that was 12 what I was being faced with, that, yeah, 13 everybody put into a letter that Gregg had 14 did, had done all these things. And what 15 reason would I have not to believe several 16 people who were all saying the same thing, 17 or that, you know, there was -- they each 18 had some, you know, case specific to them 19 that, you know, was, you know, was like 20 over bounds or overstepped or whatever. 21 Q. Right. Every one of their reports 22 was an example of a director overstepping 23 his bounds, right? 24 A. There was never -- there was never 25 a report. If there was a report I would</p>	<p>1 front of Marnie," is that what you mean by 2 if she would have raised complaints to her 3 you would have told her to go to the right 4 people? 5 A. I don't know what that message was 6 in reference to. 7 Q. Here is one where you say, "don't 8 trust Marnie," so is that telling Lisa not 9 to trust the human resources department? 10 Is that what you mean? 11 A. I don't know what the message is in 12 reference to. 13 Q. Again, I'm happy to show context, 14 but your lawyers have to agree because 15 these things were produced in a very weird 16 format like the one I showed you. 17 A. Well, I can't tell you what I may 18 have said not to talk in front of her 19 about. I don't know. 20 Q. Because the time was when Lisa -- 21 A. Hold up. You are breaking up on 22 that one. 23 THE WITNESS: Is anybody else 24 hearing static? Is it just me? 25 MR. GOLD: I can hear you okay,</p>
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<p>1 have said: Write it up in an e-mail and 2 send it. Same way I had Tiffany do. Same 3 thing I had Lara do. Same thing I had 4 Laura do. 5 I would say write, write down 6 what is wrong or whatever, what is going 7 on. The same thing when Lisa and Marnie 8 got in a fight, or Marnie was saying she 9 wanted to -- Lisa was a cancer and should 10 be removed from the organization, stormed 11 out, slammed the door or whatever. Right 12 or wrong, wrote up a report on that. 13 There would be no scenario 14 where I would say let's not put this in 15 writing. So, no, I don't buy, I don't buy 16 it. 17 Q. Just for the record, let me just 18 keep the record here, Exhibit 1 is the 19 complaint. Exhibit 2 is what I have saved 20 on my computer as Exhibit 10. 21 Exhibit 3, all right, I'm going 22 to show you. Do you see this exhibit which 23 was saved in my computer as Exhibit 11? 24 A. Yep. 25 Q. You told Lisa, "but don't talk in</p>	<p>1 actually. 2 BY MR. CARSON: 3 Q. I mean, look at the date, 3/20/18, 4 right, so the timing does match up with the 5 timing of right after AIPAC and Israel? 6 A. I mean, I don't know what the 7 context of the message is. Again, I don't, 8 I don't know what it is in reference to. 9 Q. Did you ever tell Lisa when she 10 told you about what happened in Israel that 11 she shouldn't talk in front of Marnie and 12 not to trust Marnie? 13 A. Did I tell Lisa not to go to Marnie 14 and report something? 15 Q. Yes. That's my question. 16 A. No, I don't believe I told -- that 17 -- no. 18 Q. So why would you tell her not to 19 talk in front of Marnie, and the other one 20 says, "don't trust Marnie," right? 21 A. I don't know. Maybe vacation time, 22 she needed to go to a class or leave early, 23 and Marnie was keeping tabs on people's 24 hours in the office. I don't have any 25 context on the message.</p>

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<p>1 But, "don't talk in front of 2 Marnie," maybe it was we were going to 3 happy hour and we weren't inviting her. 4 Or, I don't know. I don't have context. 5 MR. WALTON: Maybe I'm missing 6 this, but is there a reason why we are not 7 showing him the full message? 8 MR. CARSON: I have them, but 9 you guys don't, I don't think, Dave. 10 MR. WALTON: Why don't we? Why 11 don't we? 12 MR. CARSON: Everything we have 13 is through Cornerstone, and I have 14 everything from the original production. 15 So, I mean, I'm not -- 16 MR. WALTON: That would be 17 great if you showed it to him. I certainly 18 wouldn't have an objection to that. 19 MR. GOLD: I don't have one 20 either. 21 MR. CARSON: You know, the 22 stuff that you guys were putting up last 23 week, I can show you guys context on that 24 stuff new, but like, you know what I mean, 25 everything came through Cornerstone. You</p>	<p>1 record? Let's go off the record. 2 (Recess taken.) 3 THE VIDEO SPECIALIST: We are 4 back on the record. 5 BY MR. CARSON: 6 Q. All right. Give me a second. So 7 do you recognize this? I can scroll around 8 if you need to look at it. But I'll 9 represent to you that it is the document 10 that your counsel, counsel for MEF, 11 produced during the course of discovery 12 that are, it looks like electronic 13 communications between you and Mr. Pipes. 14 A. Okay. 15 Q. As you can see, they begin on April 16 13th, 2018. So my first question to you 17 is: Do you know whether these are text 18 messages, Whatsapp messages, Telegram 19 messages? 20 A. I don't. 21 Q. Do you recall whether you and Mr. 22 Pipes had conversations on text message? 23 A. I don't. At some point -- I always 24 try to keep everything in e-mail. But at 25 some point Telegram became the preferred</p>
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<p>1 guys took me out of it in that whole 2 situation, which I think is probably a 3 silly thing that you guys did. I won't 4 even say why. But, you know -- 5 MR. WALTON: How were you taken 6 out of it? 7 MR. CARSON: I was never -- 8 just go back and look at the record in the 9 Sanchez case, and I think you will see how 10 I was taken out of it. I was taken out of 11 it by judicial decree. 12 THE WITNESS: I can't really 13 follow the conversation. It is all static. 14 Should I disconnect from audio and 15 reconnect or something? Can you guys hear 16 me? 17 MR. WALTON: It sounds good on 18 our end. It could be your headphones 19 again. Why don't you try it, Matt. Just 20 reconnect. Can we go off the record. 21 MR. CARSON: Yeah. If you want 22 I'll send you the whole thread between 23 Marnie, I mean between Lisa and Matt. I 24 don't have a problem doing that. It is 25 just that all the stuff -- are we off the</p>	<p>1 vehicle. And that's what I believe was the 2 -- I don't know what time, you know, in my 3 employment that was, but, yeah. 4 Q. Well, these messages go from April 5 2018 to November 2019. 6 A. Okay. 7 Q. And, I mean, I can scroll around as 8 much as you tell me to. But are you saying 9 these are Telegram messages? 10 A. I'm saying I would have no way to 11 know. I mean, I mean, if you are saying 12 they are not e-mails, then -- 13 Q. Well, do they look like e-mails to 14 you? 15 A. Oh, these are actual snippets? I 16 thought it was just you were showing me who 17 said what in the conversation. 18 Q. Every message, I think, that you 19 and Daniel Pipes sent each other between 20 these two dates. 21 A. Oh, that's what the time stamps 22 are. Yeah, then they are text messages. 23 Q. Yeah, and it is 129 pages of these 24 messages. 25 A. Okay.</p>

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<p>1 Q. I mean, it could be Telegram or 2 Whatsapp. I think they all made sense. 3 And I don't know what that e-mail looks 4 like. I'm asking you. I mean, you are the 5 one who sent and received them for all 6 these months. So do you remember what 7 medium you used?</p> <p>8 A. Probably Telegram. I mean if it 9 was -- you know, I may be after -- I don't 10 know. I would say at some point, yeah, we 11 transitioned from -- we had something else, 12 we had something else before that. I think 13 it was called Slack. And I hated Slack, 14 and I don't think Daniel liked it either. 15 Then he moved to Telegram. So it is either 16 Slack or Telegram, depending on whatever. 17 If you are saying it goes all the way 18 through, whatever date you said, it was 19 probably Telegram.</p> <p>20 Q. All right. So the first one I'm 21 going to direct you to is on page 6002. 22 I'll make it a little smaller so you can 23 see that. All right. So 6002, it says 24 here, I don't know if this thing -- if you 25 have this thing on your computer too, but</p>	<p>1 guess, you know, day-to-day work like that 2 for Daniel?</p> <p>3 A. I mean, it was part of all of our 4 jobs. I mean, Daniel asks you to do 5 something, then it is like the same place I 6 worked everywhere else in my life, the top 7 person asks you to do something, it is 8 like, I don't know, opportunity to 9 demonstrate you can do it, or, you know, 10 time to build, so he can see what your work 11 ethic is like.</p> <p>12 So was it common? I mean, I --</p> <p>13 Q. Well, he didn't ask you to do it, 14 right? He asked you to have Lisa do it, 15 correct?</p> <p>16 A. Well, I don't think he saw me as 17 the travel coordinator.</p> <p>18 Q. Yeah. That was a lower, that was 19 too menial a task for you? You were a 20 director of development, right?</p> <p>21 A. I believe so. I mean, Gregg was 22 traveling at that time. I think I had 23 traveled with him. I don't remember the 24 last trip. Maybe that was in Pennsylvania. 25 We did a round of fund raising meetings.</p>
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<p>1 this message looks like it was sent on, it 2 says 12 October.</p> <p>3 A. Okay.</p> <p>4 Q. Dave pipes sent a message to you at 5 8:36. "Could you ask Lisa to help me with 6 the flights and hotels for this trip? I 7 prefer UA than AA for flights, prefer aisle 8 than window, prefer IHG than SPG and 9 Hyatt." Do you remember receiving this 10 message?</p> <p>11 A. No, of course not. No, I don't. 12 Like you are showing me that the message 13 exists, so, yes, I'm sure that it exists. 14 But do I remember, do I remember messages 15 from two years ago that were exchanged in 16 the administrative happenings day-to-day in 17 the office, no, I don't.</p> <p>18 Q. Well, was that common for Daniel 19 Pipes to have you, have you have Lisa book 20 flights for him and hotel rooms and things 21 like that?</p> <p>22 A. What was the beginning? Was it, 23 was it common, is that what you asked?</p> <p>24 Q. Was that part of Lisa's job, 25 booking flights and hotel rooms and doing I</p>	<p>1 So if he was, yeah, Daniel was like in the 2 office and Gregg was out, then -- and I 3 mean, I'm not sure of the nature of the 4 question, is it beneath me to do travel 5 scheduling for Daniel? Is that --</p> <p>6 Q. Was it beneath your position, was 7 my question, not you.</p> <p>8 A. No. I did it all the time. I 9 booked Gregg's travel. I booked Daniel. I 10 booked other. I booked my own travel.</p> <p>11 Q. As the director of development or 12 before you were the director of 13 development?</p> <p>14 A. Both.</p> <p>15 Q. But, again, what was Lisa's job at 16 the time? What was her position?</p> <p>17 A. At this time, October 2018?</p> <p>18 Q. Yes. She was Gregg's assistant, 19 correct?</p> <p>20 A. There was something, I don't know 21 if she was taking on press releases or 22 media or marketing or public relations 23 maybe. There was some other title that was 24 introduced for her, that I don't remember 25 -- I remember she was asking me what I</p>

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<p>1 thought about titles. But I believe she</p> <p>2 was going to be made like the, it was like</p> <p>3 chief of staff, like the head of all the</p> <p>4 staff that were in local, in Philadelphia.</p> <p>5 I don't remember what the title was</p> <p>6 eventually decided on, but she was to</p> <p>7 become chief of staff.</p> <p>8 Q. The question was what was her job</p> <p>9 at that time, not what was she going to</p> <p>10 become.</p> <p>11 A. Oh. Well, I mean, at the time I</p> <p>12 was director of special projects I was</p> <p>13 actually directing all the development</p> <p>14 while Tiffany was out to lunch.</p> <p>15 So, I mean, I guess her</p> <p>16 official title at that time was whatever</p> <p>17 she was hired as, executive liaison.</p> <p>18 Q. She was Gregg's assistant, right?</p> <p>19 A. In October, I believe so. I mean</p> <p>20 unless the title changed somewhere -- what?</p> <p>21 Q. It wasn't a trick question.</p> <p>22 A. No, I mean, I'm telling you</p> <p>23 October, 26 months ago, I don't know when</p> <p>24 her title changed or at what point or</p> <p>25 whatever. I just remember she was doing</p>	<p>1 message from you. "Received your message.</p> <p>2 Everything is understood and no problem</p> <p>3 with the office. Your paperwork summary</p> <p>4 was mostly accurate. I've learned more</p> <p>5 from everyone involved since yesterday. We</p> <p>6 should talk in person."</p> <p>7 Do you know what you are</p> <p>8 referring to there?</p> <p>9 A. What was the date?</p> <p>10 Q. The date was November 2nd, 2018?</p> <p>11 A. "Received your message. Everything</p> <p>12 is understood and no problem with the</p> <p>13 office. Your paperwork summary was mostly</p> <p>14 accurate."</p> <p>15 I really don't remember. Let</p> <p>16 me see what, the JNS article was terrific,</p> <p>17 tag line not sure...</p> <p>18 THE COURT REPORTER: Excuse me.</p> <p>19 Q. He can read to himself. You don't</p> <p>20 have to record what he reads to himself if</p> <p>21 you don't want to.</p> <p>22 A. Oh, sorry. Read the message out</p> <p>23 loud.</p> <p>24 Q. I'm just letting the court reporter</p> <p>25 know, if she doesn't want to write it down,</p>
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<p>1 good. She was a good writer. She was --</p> <p>2 she stayed at the office late. She -- it</p> <p>3 would be like, you know, like Tricia</p> <p>4 demonstrated competency. I wanted her to</p> <p>5 take on more. Lisa demonstrated</p> <p>6 competency. I wanted her to take on more.</p> <p>7 I wanted a lot of it off my</p> <p>8 plate. I was like drowning in all of</p> <p>9 the -- in everything. I was very happy</p> <p>10 that they were like good at what they were</p> <p>11 doing. I don't know when the idea of the</p> <p>12 promotion came about or who introduced it.</p> <p>13 I know Marnie was against it.</p> <p>14 Q. Was she ever given the title chief</p> <p>15 of staff during your employment?</p> <p>16 A. I don't believe so. I mean if -- I</p> <p>17 would have had to update the website with</p> <p>18 the new title and I don't remember doing</p> <p>19 that.</p> <p>20 Q. I'm going to direct your attention</p> <p>21 to another message. This one, it looks</p> <p>22 like it was sent, Daniel Pipes sent a</p> <p>23 message to you at 10:40, and that would be</p> <p>24 on November 1st, I believe, and then the</p> <p>25 next one was November 2nd. This is a</p>	<p>1 it is fine.</p> <p>2 A. Okay. I don't -- I don't know what</p> <p>3 message I'm saying that I received. I</p> <p>4 don't remember what problem -- I mean, I</p> <p>5 guess this is after the letter was</p> <p>6 introduced. I don't know what a paperwork</p> <p>7 summary is.</p> <p>8 Everyone involved, I guess that</p> <p>9 means the letter. And then I could only</p> <p>10 guess that at that point they had started</p> <p>11 telling me all the things that were in the</p> <p>12 letter.</p> <p>13 Hello?</p> <p>14 Q. Yeah, I'm thinking of my question.</p> <p>15 A. Oh, sorry.</p> <p>16 Q. What did you mean when you said you</p> <p>17 "learned more from everyone involved since</p> <p>18 yesterday"?</p> <p>19 A. I don't know. I don't -- I just</p> <p>20 told you, I believe, like the only thing I</p> <p>21 could think of is that if the date I was</p> <p>22 informed of the letter was the day before,</p> <p>23 and they -- and we spoke about it more,</p> <p>24 then I learned more details, my best guess.</p> <p>25 Q. So what details did you learn?</p>

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<p>1 A. I don't know. I don't know. My 2 guess is that the details of what they are 3 saying. Well, actually instead of Gregg 4 being a dork, he was actually -- he said 5 and did this.</p> <p>6 Or instead of AIPAC being 7 nothing, AIPAC was actually sexual assault, 8 and I felt uncomfortable, and whatever.</p> <p>9 Q. When did someone tell you AIPAC was 10 nothing?</p> <p>11 A. When did someone tell me AIPAC was 12 nothing? At some point when I asked 13 Tricia, why didn't you tell me, why didn't 14 you tell me, or something happened and you 15 felt uncomfortable, and I think she said it 16 was nothing.</p> <p>17 Q. I'm not going to beat a dead horse, 18 the horse being the issue, not --</p> <p>19 A. I'm not the dead horse then.</p> <p>20 Q. No. The issue is what I was 21 referring to.</p> <p>22 All right. So let's keep 23 moving. The next one down is, it says, "I 24 am fine now, recovered, would like to hear 25 from you about the Leah matter."</p>	<p>1 believed that, you know, I had no reason to 2 believe that they would both say that it 3 didn't happen or both make it up on their 4 own accord. So, yeah.</p> <p>5 Q. So when did you and Mr. Pipes have 6 that conversation?</p> <p>7 A. I don't know. What is the date of 8 this message?</p> <p>9 Q. November 2nd.</p> <p>10 A. November. My mother's birthday. I 11 don't remember. That was it. The meeting 12 was, what, the next day, two days after.</p> <p>13 Q. Do you know if you and Mr. Pipes 14 spoke on the phone, you spoke in person 15 about the Leah matter?</p> <p>16 A. Could have been in person. I'm 17 sure you can find out who was in the 18 office, see if he was in the office, then I 19 spoke with him in person. And if he wasn't 20 and we did speak, then, obviously, it was 21 over the phone.</p> <p>22 Q. You don't remember having a 23 conversation with Daniel Pipes about Gregg 24 Roman having sex with an intern that you 25 got the job for?</p>
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<p>1 Daniel Pipes is asking to hear 2 from you about the Leah matter; is that 3 correct?</p> <p>4 A. Yeah, it looks like it.</p> <p>5 Q. What is the Leah matter?</p> <p>6 A. I believe what Marnie said in the 7 letter or that was in the letter, the rumor 8 that he had slept with her or something 9 happened, and whatever the rumor is, in 10 Israel. And that's it. The paper and 11 everything we mentioned before, that there 12 was this paper she needed, and apparently 13 -- Lisa said, Marnie said that he had told 14 them that he had slept with her.</p> <p>15 Q. Is that what you told Mr. Pipes?</p> <p>16 A. I told him that I was, that I was 17 upset to learn of it, and if, that if -- 18 that if that was true, I was worried 19 that -- you know, I was extremely angry 20 with Gregg, if he would jeopardize me like 21 that, with my name being on, as the person 22 who signed off on her internship and sort 23 of now I'm linked to such a thing.</p> <p>24 And with Marnie and Lisa both 25 telling me that I have no, you know, I</p>	<p>1 A. No. When this came to light, the 2 only thing I remember is telling him is 3 that, like, I was fearful for my job. I 4 was almost in -- I didn't know what was 5 going to happen. I didn't know if Marnie 6 was blaming me or alleging, or Lisa was 7 alleging that somehow I was complicit in 8 whatever that they are saying had taken 9 place, and I didn't know if him finding out 10 about that, he was going to be like, oh, 11 well, you are gone, and Gregg is gone.</p> <p>12 I didn't know what was going to 13 happen. So I said everything I knew, which 14 was I don't know what happened. Marnie 15 said he told her, I believe Lisa said that 16 he had told her.</p> <p>17 Q. But the conversations happened 18 before the D Day meeting, correct?</p> <p>19 A. Well, yeah. You are saying it is 20 like the day before or two days before.</p> <p>21 Q. I'm not saying that. I'm asking 22 the questions. Is that what you are 23 saying?</p> <p>24 A. Can I see the rest of the messages? 25 Like is it mentioned down below. Is it</p>

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<p>1 mentioned --</p> <p>2 Q. Take your time. You can look</p> <p>3 through it as much as you want.</p> <p>4 A. I'm saying if there is other stuff</p> <p>5 that relates to that conversation, like</p> <p>6 please show it to me because I don't --</p> <p>7 Q. It is something that Gregg has</p> <p>8 raised about what's going on the many</p> <p>9 months since the alleged incident, so what</p> <p>10 was that? Did he tell you what that was?</p> <p>11 A. Also something that Gregg has</p> <p>12 raised about what's gone on in the many</p> <p>13 months since the -- I expect the same thing</p> <p>14 that was going on, is that we were going to</p> <p>15 happy hours and out, and everything was,</p> <p>16 you know, everything seemed fine. We were</p> <p>17 socializing as a group.</p> <p>18 Q. You told Mr. Pipes, "I expect him</p> <p>19 to call me now and will call you after."</p> <p>20 Who is he? Gregg Roman, correct?</p> <p>21 A. Is that right after that message?</p> <p>22 Yeah, I guess so.</p> <p>23 Q. Okay.</p> <p>24 A. I mean, who else would it be? I</p> <p>25 guess.</p>	<p>1 interrupting him, because I think that</p> <p>2 would help the court reporter too.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. So you know that Gregg Roman --</p> <p>5 whether Gregg Roman stole all the leads</p> <p>6 from the Jewish Federation in Pittsburgh</p> <p>7 before he got there?</p> <p>8 A. No.</p> <p>9 Q. You don't know that?</p> <p>10 A. I don't know that.</p> <p>11 Q. Yeah, you know that. You know.</p> <p>12 A. Do I know if he stole leads? I</p> <p>13 mean, first of all --</p> <p>14 Q. Yeah. You guys have two different</p> <p>15 databases at MEF, right? One was for the</p> <p>16 Jewish Federation stolen leads and one was</p> <p>17 for MEF donors?</p> <p>18 A. And where was the second database?</p> <p>19 Q. You tell me. You worked there.</p> <p>20 A. I used Sales -- no. I used</p> <p>21 whatever the initial database was, they had</p> <p>22 when they were hired. Then they -- oh,</p> <p>23 then, when I -- yeah, then at some point</p> <p>24 Tiffany was responsible for managing the</p> <p>25 transition to another database, and that</p>
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<p>1 Q. "I'm trying to ensure he isn't</p> <p>2 notified, unless you don't care." Again,</p> <p>3 you are talking about Gregg Roman?</p> <p>4 A. Maybe Salesforce, because the</p> <p>5 message before that says Salesforce is up.</p> <p>6 It was down. And I don't know why. But, I</p> <p>7 don't know, Salesforce wasn't working. All</p> <p>8 of a sudden I started thinking, I don't</p> <p>9 know, like started getting paranoid.</p> <p>10 Q. That Gregg would steal sales leads</p> <p>11 and donor information, correct?</p> <p>12 A. Yeah, and later found out that</p> <p>13 wasn't the case, and that I made -- I mean,</p> <p>14 look --</p> <p>15 Q. Well, it was part --</p> <p>16 THE COURT REPORTER: I'm sorry.</p> <p>17 This is the court reporter. There is</p> <p>18 static, and I couldn't hear the last</p> <p>19 answer.</p> <p>20 MR. CARSON: Sorry. The static</p> <p>21 is from someone else's phone. I think</p> <p>22 someone needs to push mute?</p> <p>23 MR. WALTON: This is Dave,</p> <p>24 Eleanor.</p> <p>25 Seth, please just watch</p>	<p>1 was Salesforce. She botched that data</p> <p>2 migration. Then I finished that data</p> <p>3 migration. But that was it. That was the</p> <p>4 only database I ever used, was Salesforce.</p> <p>5 Q. You never used Mailchimp?</p> <p>6 A. Well, Mailchimp is like a news</p> <p>7 letter mailer. It is not a database.</p> <p>8 Q. What is the, what is the director's</p> <p>9 list?</p> <p>10 A. Oh, in the list of, the</p> <p>11 distribution list in Mailchimp?</p> <p>12 Q. Yeah. You know what the director's</p> <p>13 list is, right?</p> <p>14 A. Yeah, it is private e-mail. It is</p> <p>15 like contacts or high-level people, that if</p> <p>16 you just wanted to send specific, not --</p> <p>17 there was multiple lists, Campus Watch,</p> <p>18 Islamic Watch, director's list, Daniel's</p> <p>19 list, targets' list.</p> <p>20 Q. Yeah. It is all the information he</p> <p>21 stole from the Jewish Federation, correct?</p> <p>22 A. How would --</p> <p>23 Q. Well, how would you know that?</p> <p>24 A. Incorrect. How would I --</p> <p>25 Q. Why would you say correct if you</p>

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<p>1 don't know?</p> <p>2 MR. WALTON: This is Dave.</p> <p>3 Object to the form. You can answer.</p> <p>4 A. You are saying is it correct. No,</p> <p>5 it is not correct.</p> <p>6 Q. Why isn't it correct?</p> <p>7 A. Well, I have no way to know if it</p> <p>8 is incorrect, if that's what you are asking</p> <p>9 me, what. You are asking if the director's</p> <p>10 list is something that Gregg stole from</p> <p>11 another organization.</p> <p>12 Q. Right, yeah. That's exactly what</p> <p>13 he is accusing Lisa of doing, is what he</p> <p>14 did to the Jewish Federation, right?</p> <p>15 A. The first I ever heard that Gregg</p> <p>16 would steal, or you are alleging that Gregg</p> <p>17 had stolen e-mail addresses from another</p> <p>18 organization, and, but as somebody who</p> <p>19 worked at the Jewish Federation, I can tell</p> <p>20 you, I mean, it is like I'm laughing on the</p> <p>21 inside because I know that it is worthless.</p> <p>22 It is federation. It is not -- most likely</p> <p>23 they are not going to support anything that</p> <p>24 MEF is doing, and e-mailing them such</p> <p>25 things would result in them unsubscribing</p>	<p>1 BY MR. CARSON:</p> <p>2 Q. Mr. Bennett, I'm going to direct</p> <p>3 your attention to D6004?</p> <p>4 A. I don't know what 6000 number or</p> <p>5 whatever.</p> <p>6 Q. The number I'm reading, it is more</p> <p>7 for the record.</p> <p>8 A. Oh, I didn't see it at the bottom.</p> <p>9 Okay.</p> <p>10 Q. It is called a Bates stamp. So you</p> <p>11 write here: It is probably safe to say he</p> <p>12 is already back -- he already has</p> <p>13 everything backed up. That's Gregg Roman</p> <p>14 already backing up all the proprietary</p> <p>15 information MEF has, right? That's what</p> <p>16 you are talking about?</p> <p>17 A. Probably safe to say -- is this the</p> <p>18 same, is this following the same above?</p> <p>19 Q. Yes.</p> <p>20 A. Can I scroll up to see what we are</p> <p>21 talking about here?</p> <p>22 He has his MEF access through</p> <p>23 the gmail account, so we have this -- I</p> <p>24 mean, I said he. Hi. Bruce had access I</p> <p>25 believe to Salesforce and so did other</p>
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<p>1 from the list, then they flag your mailing</p> <p>2 list, and you can say how was I added to</p> <p>3 this list if you did not have permission to</p> <p>4 add me.</p> <p>5 So for him to take a list from</p> <p>6 another organization, which I have no</p> <p>7 knowledge of, or, until I'm blue in the</p> <p>8 face can tell you it would do damage to</p> <p>9 MEF. It would be -- it wouldn't be</p> <p>10 helpful.</p> <p>11 Q. This is the first you are hearing</p> <p>12 about sexual harassment too, right?</p> <p>13 A. The what?</p> <p>14 Q. The first you are hearing about</p> <p>15 sexual harassment too, right?</p> <p>16 MR. WALTON: Objection to form.</p> <p>17 You can answer.</p> <p>18 Q. You don't have to answer.</p> <p>19 A. Okay.</p> <p>20 (Discussion off the record.)</p> <p>21 THE VIDEO SPECIALIST: We are</p> <p>22 off the record.</p> <p>23 (Recess taken.)</p> <p>24 THE VIDEO SPECIALIST: We are</p> <p>25 back on the record.</p>	<p>1 staff. But it is like at this point in</p> <p>2 time -- yeah, I believe we are talking</p> <p>3 about Gregg.</p> <p>4 Q. You thought he would steal all the</p> <p>5 proprietary information from MEF, right?</p> <p>6 A. I wasn't worried about stealing it.</p> <p>7 It was more of, it was more of like the</p> <p>8 database was down, and that's how I do my</p> <p>9 job, with the database. I didn't know why</p> <p>10 the database was down. And at the time the</p> <p>11 turmoil with Gregg, my thought was, well,</p> <p>12 maybe that has something to do with it.</p> <p>13 Turned out that that wasn't the case and I</p> <p>14 raised like an alarm over the database</p> <p>15 incorrectly.</p> <p>16 Q. How did it turn out it wasn't the</p> <p>17 case?</p> <p>18 A. There was nothing linked to a gmail</p> <p>19 account or -- I mean, scroll back up where</p> <p>20 I said -- more. More. More.</p> <p>21 Yeah, there is something in</p> <p>22 place preventing me, it was the generic</p> <p>23 user account, which I believe it was</p> <p>24 Tiffany Lee's but was used to like</p> <p>25 implement the database, and that account</p>

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<p>1 needed to have a setting on it for me to 2 try to do what I think I was trying to do. 3 I mean, I don't remember 4 exactly. I just remember there was 5 something blocking me from just like 6 shutting things down or to make sure that, 7 I don't know, there wasn't some breach. 8 We have been hacked by what 9 was, I don't know, could be Iran or there 10 were other hacks that had happened, and, I 11 mean, while Gregg was there and after Gregg 12 was there, and, you know, that was the 13 fear, something like that. 14 Q. When you say hacked by Iran, is 15 that pretend security issues that MEF 16 always talks about? Is that what you are 17 referring? 18 A. The pretend security issues? 19 Q. Yeah. You know, secret, secret -- 20 A. I'm pretty sure you could -- 21 THE COURT REPORTER: I'm sorry. 22 I couldn't hear the question. 23 Q. You are referring to like the 24 secret MEF work that everyone is trying to 25 hack because it is so important, right?</p>	<p>1 his personal information or an app or 2 something. But, I mean, everybody has 3 contacts stored somewhere. 4 Q. So is Gregg Roman allowed to back 5 up MEF data on his contacts, on his 6 personal Contactually account? Is that 7 permitted, as far as you know? 8 A. No, I never said he backed up 9 anything on a Contactually account. I 10 never actually saw Contactually. I don't 11 even know -- I had no, I mean, I know that 12 there was something -- I mean, look, we 13 Asana, we had Slack, we had Salesforce. We 14 had the website access point login. 15 We had, I mean, I had a sheet 16 with 30 different passwords to different 17 applications that housed different data. 18 We had people build us special databases 19 that needed specific logins. 20 Q. Did MEF pay for Contactually? 21 A. Did MEF pay for it? We did an 22 audit, I believe the tech company did an 23 audit of -- not the tech company. The 24 vendor that I brought in to transition us 25 to Google, and I think they asked Marnie to</p>
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<p>1 A. I'm pretty sure you could look up a 2 public record that ISIS tweeted the address 3 of the office and had Daniel Pipes on the 4 cover of their magazine, and, I mean, 5 that's not pretend. 6 Q. Okay. 7 A. Had I been asked to work in an 8 office that ISIS tweeted the address of, I 9 would never have accepted the job, no 10 matter how much they paid. 11 Q. What is Contactually? 12 A. Contactually is like, it is like a 13 Rolodex, as I understand it. 14 Q. Is that where you thought Gregg 15 Roman backed up all the proprietary 16 information that MEF had? 17 A. No. I think that was just his 18 personal, like Contactually -- 19 Q. Yeah. 20 A. -- I think -- 21 Q. He had his personal account, right, 22 where he backs up proprietary information? 23 A. I don't think so. I mean there was 24 -- I know he used something, but I think it 25 was on Outlook, Outlook 365, that he had</p>	<p>1 like show a list of everything that, yeah, 2 everything that was being paid for on the 3 MEF credit card. So it will be on that. 4 It will be on that list if we were paying 5 for it. 6 Q. Sitting here today, do you know 7 whether MEF paid for Contactually? 8 A. If it was -- I mean, if it was 9 ours, then MEF paid for it. Anything that 10 we were using, MEF was paying for it. 11 There was no -- I don't know why anybody 12 would pay for anything out of their own 13 pocket to have it be used by the company. 14 Q. What did you mean here then when 15 you said "Probably in Contactually," right? 16 A. Well, that would be the only thing 17 I knew that would be capable of doing 18 something like that. 19 Q. Yeah. 20 A. But as far as I understand or 21 understood, it was in that -- I can't say 22 for sure, but I'm almost certain that 23 MEF -- that it will show up on a list of 24 the audit that I asked the vendor to do, 25 and Marnie to show, show everything that's</p>

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<p>1 paid for with the MEF credit card.</p> <p>2 So I'm telling you at this</p> <p>3 moment, I don't know. I'm fairly certain</p> <p>4 that it will appear on that list that shows</p> <p>5 that MEF did pay for it, and it was like,</p> <p>6 it was like bridge connector to maybe</p> <p>7 another dataset, or like we had multiple</p> <p>8 bridge connectors.</p> <p>9 There was the mapping one that</p> <p>10 Stacy used to help geo locate or, you know,</p> <p>11 the best route, through sales meetings,</p> <p>12 through, you know, solicitation meetings,</p> <p>13 through a specific city or a specific</p> <p>14 state.</p> <p>15 There was the Outlook, I don't</p> <p>16 know what you want to call it, bridge link,</p> <p>17 connector, that would synchronize people's</p> <p>18 e-mails, all their contacts to Salesforce.</p> <p>19 There was one for Asana. There</p> <p>20 was one for Slack. And we did a tech</p> <p>21 audit, and I believe they all showed up in</p> <p>22 that audit.</p> <p>23 Q. What audit? Would there have been</p> <p>24 an audit on Mr. Roman's Contactually</p> <p>25 account?</p>	<p>1 So when I was finally, until I</p> <p>2 was blue in the face, got the go-ahead for</p> <p>3 that, I brought in the expert that I knew,</p> <p>4 a vendor who is licensed to provision</p> <p>5 Google apps, and the first thing that he</p> <p>6 did was an audit on the infrastructure, the</p> <p>7 same thing that any IT person would do.</p> <p>8 You come in and you say, let's make a list</p> <p>9 of every single thing that's being used,</p> <p>10 from soup to nuts, starting with Word</p> <p>11 documents, e-mail, through Asana, Slack,</p> <p>12 everything.</p> <p>13 And as part of that audit</p> <p>14 Marnie, which controls the expenses or has</p> <p>15 records of what was being paid for,</p> <p>16 produced or would produce a list of all of</p> <p>17 the vendors and tech platforms that were,</p> <p>18 subscriptions were being paid to.</p> <p>19 So upon the audit, it was</p> <p>20 learned a lot of them were just stuff that</p> <p>21 was, you know, we needed to sign up for one</p> <p>22 time but was never used again, to like</p> <p>23 condense PDF documents. And I believe in</p> <p>24 that audit, on that list that she provided</p> <p>25 to the vendor, I believe in maybe January</p>
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<p>1 THE COURT REPORTER: I'm sorry,</p> <p>2 an audit on?</p> <p>3 Q. Mr. Roman's Contactually account.</p> <p>4 A. No. When I -- I was a proponent of</p> <p>5 using, it was -- I was in favor of using</p> <p>6 Google, like using the Google for Work</p> <p>7 platform, meaning e-mail contacts.</p> <p>8 Everything that could fall under like</p> <p>9 Microsoft, Google can offer the competing</p> <p>10 platform.</p> <p>11 So when Gregg didn't believe</p> <p>12 that and he thought, and Daniel thought</p> <p>13 that, you know, half of the Microsoft was</p> <p>14 superior, so finally I had at some point</p> <p>15 after I guess November or October,</p> <p>16 whatever, I started arguing with him and</p> <p>17 Daniel and saying, look, I know what I'm</p> <p>18 talking about, I used to do this, I used to</p> <p>19 work for a tech company that sold, you</p> <p>20 know, Google apps, and I had to manage a</p> <p>21 sales team of six people and the worldwide</p> <p>22 campaigns to sell those products. I know</p> <p>23 how they work, and I'm confident they are</p> <p>24 secure, and they will be good for the</p> <p>25 organization, boost productivity, etcetera.</p>	<p>1 of 2019 or whatever, it will show that, all</p> <p>2 of the things that are on there.</p> <p>3 So back to your question, if</p> <p>4 Contactually was being paid for by the</p> <p>5 organization, it would appear in that</p> <p>6 audit. I haven't seen that audit. I'm not</p> <p>7 telling you it appears there. I'm saying</p> <p>8 that's where you can check to prove what</p> <p>9 I'm saying.</p> <p>10 Q. Isn't this conversation talking</p> <p>11 about making sure that you revoke Gregg's</p> <p>12 access to MEF donor information and the</p> <p>13 proprietary information, and that you say:</p> <p>14 It is probably safe to say he already has</p> <p>15 everything backed up, both Mailchimp and</p> <p>16 Salesforce, probably in Contactually. Not</p> <p>17 probably. Definitely.</p> <p>18 That's exactly what you are</p> <p>19 saying, right, who cares?</p> <p>20 A. Yeah. I mean, yep, to the best</p> <p>21 of -- probably safe to say, yeah. I mean</p> <p>22 he is responsible for all the proprietary</p> <p>23 information of the organization. I mean,</p> <p>24 whose head is it going to fall on?</p> <p>25 I am now managing director of</p>

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<p>1 another organization, and I saw another 2 director when I was with ZOA, and you have 3 to everything backed up. It is usually a 4 tech company that will have a server, an 5 external server that will store back-ups in 6 case you are hit with like some type of 7 electromagnetic pulse just wipes you out, 8 technologically, or that you don't have any 9 ability to get back to determine, like get 10 back to the point you were when things 11 dropped. 12 So as part of the 13 infrastructure that I wanted to implement 14 with Google, I was trying to, one of the 15 things that I made sure I said, we will 16 have a back-up that will back up in 17 realtime every single thing that is in the 18 database. I'm trying to remember the name 19 of that one with Google. It is called like 20 Backupify. 21 I mean, it is my natural 22 thought as, you know, if you are the 23 caretaker of the data, it seems dumb to 24 only have one dataset. 25 Q. Daniel Pipes then says to you: Can</p>	<p>1 an NDA on day one. I don't know if any -- 2 I mean, I'm sure everybody else did, as far 3 as I know. If they didn't, then maybe they 4 were asked to sign one then. I had one 5 from the beginning of my employment signed. 6 So was I asked to sign it then? If -- 7 Q. We are not, I'm not asking you 8 about the NDA you signed on day one. I'm 9 asking about the NDA you signed before the 10 November 5th, 2018 meeting, which has been 11 referred to as D Day. Do you understand 12 that? 13 A. Yeah, yeah. So what is the 14 question? 15 Q. The question is: You were asked by 16 Daniel Pipes to get him all those signed 17 NDAs for everyone that was going to attend 18 that meeting, right? 19 A. I didn't give it to him. I mean, 20 Daniel asked if NDAs, as the text messages 21 you are showing me say, has everyone signed 22 NDAs. Then I checked, has everyone signed 23 an NDA. And looks like they did. And I 24 said, yep, they are in Marnie's office. 25 Q. Can you send me a copy of the NDAs</p>
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<p>1 you send me a copy of the NDA everyone has 2 signed? 3 A. Oh, yeah. 4 Q. You had all the NDAs, right? 5 A. It looks like it. Do you have 6 personal e-mails for... 7 Well, what was my response to 8 that? Oh, yeah. No, just right below that 9 I said all NDAs are filed in Marnie's 10 office. 11 Q. Right. He asked you if you could 12 give him a copy of it. You made sure that 13 they were all in one place, and you told 14 him where they were, right? 15 A. I don't know if I made sure where 16 they were. Maybe I found out where they 17 were and relayed that information to him. 18 But, yes, it looks like below I'm saying 19 all NDAs are filed in Marnie's office. 20 Q. So now can you testify whether or 21 not you were asked to sign NDAs before 22 going into the November 5th, 2018 meeting? 23 A. Yeah, I believe so. I mean, look, 24 I'm sure there is an e-mail that shows like 25 if I was asked to sign it or not. I signed</p>	<p>1 everyone has signed, right? 2 He meant everyone that's going 3 to go to the meeting, correct? 4 A. I mean, look, maybe that's a copy 5 of the NDA that everyone signed when they 6 came in for their employment, or a copy of 7 the NDA before the meeting. 8 Q. Well, which one is it? 9 A. I don't know. I'm telling you it 10 doesn't say. 11 I said: All NDAs are filed in 12 Marnie's, because that's where everything 13 was kept. Marnie had the file cabinet 14 which kept all the personnel, everything 15 they ever signed. 16 My final day of employment I 17 walked in, I said, "Let me have my 18 personnel file as is allowed by law. I 19 would like to see everything I put my name 20 on." And it was my NDA. 21 Q. And he also asked for everyone's 22 personal e-mail address, right? 23 A. I just read it. He asked for three 24 people's e-mail, Marnie, Tricia and Stacey. 25 Q. Marnie, Tricia, Stacey. And you</p>

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<p>1 said: Yes, I have those e-mails. You</p> <p>2 actually said: Yes, I have personal</p> <p>3 e-mails for all, correct?</p> <p>4 A. That's what is written.</p> <p>5 Q. And the reason you had personal</p> <p>6 e-mails for all is because you guys used</p> <p>7 personal e-mails at MEF, correct?</p> <p>8 A. No, because people applied to the</p> <p>9 organization with personal e-mails.</p> <p>10 Q. You guys didn't use personal e-mail</p> <p>11 accounts during your employment at MEF for</p> <p>12 Google Docs?</p> <p>13 A. Did we use -- no.</p> <p>14 Q. Oh, you didn't?</p> <p>15 A. Did we use, like for company</p> <p>16 business?</p> <p>17 Q. Yes.</p> <p>18 A. At some point, while we were</p> <p>19 transitioning, then, yes, I believe that</p> <p>20 there was like a spreadsheet that I had</p> <p>21 created, or like a back-up to work off of</p> <p>22 while we were transitioning from Microsoft</p> <p>23 to Google.</p> <p>24 Q. When you say "we were</p> <p>25 transitioning" --</p>	<p>1 we told everybody, avoid using personal</p> <p>2 information.</p> <p>3 I sent out, the bring your own</p> <p>4 device policy specifically stated no</p> <p>5 personal information can be stored on</p> <p>6 devices. I was very careful to make sure</p> <p>7 that I didn't compromise whatever was going</p> <p>8 on in the organization.</p> <p>9 If you're trying to ask me, did</p> <p>10 I do something that somehow was in</p> <p>11 violation of MEF policy? No. To the best</p> <p>12 of my ability I tried to make sure that</p> <p>13 everything was by the book and that I was</p> <p>14 maintaining the health and security of the</p> <p>15 data and proprietary information.</p> <p>16 My, my -- my Google login,</p> <p>17 Bennett@MEForum.org, that's what we were</p> <p>18 switching to. As of March -- whatever it</p> <p>19 was, I mean, I'm pretty sure the date of</p> <p>20 the memo, whatever, bring your own device</p> <p>21 policy was, it said like if you have</p> <p>22 something on a personal device, delete it.</p> <p>23 Don't -- there is no reason to save</p> <p>24 anything to like a local device. There is</p> <p>25 no reason to download anything. Just keep</p>
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<p>1 A. Like are you asking about like work</p> <p>2 product? Or are you asking about e-mail</p> <p>3 correspondence?</p> <p>4 Like there never should be any</p> <p>5 e-mail correspondence, but like the ability</p> <p>6 to collaborate on a Google doc requires you</p> <p>7 have a gmail account. So if there is a</p> <p>8 gmail account that you are able to share a</p> <p>9 Google calendar with or a Google document</p> <p>10 with, then that would be, yeah, that would</p> <p>11 be it.</p> <p>12 Q. That's when you guys used personal</p> <p>13 e-mail addresses, with Google, correct?</p> <p>14 A. That's when we used -- what do you</p> <p>15 mean, that's when?</p> <p>16 Q. It is not a trick question.</p> <p>17 A. I don't know. You are looking --</p> <p>18 it is like you are trying to get me in</p> <p>19 got-cha moments here. Just tell me like</p> <p>20 everything and then I'll give you my like,</p> <p>21 you know, response to it.</p> <p>22 Like do I remember this shit?</p> <p>23 No. I can't remember what, two years ago,</p> <p>24 what was written in a Telegram message</p> <p>25 between me and Daniel and whatever. Like</p>	<p>1 it in the cloud.</p> <p>2 I mean you can look up the</p> <p>3 bring your own device policy. I'm sure it</p> <p>4 is all written there. I'm sure you have it</p> <p>5 already.</p> <p>6 Q. When did you make the switch to</p> <p>7 Google for Business?</p> <p>8 A. We began making it in probably</p> <p>9 January or February.</p> <p>10 Q. 2019, right?</p> <p>11 A. I had this like ongoing debate with</p> <p>12 Daniel and Gregg about the security of</p> <p>13 Google based on what was, it was arguably</p> <p>14 like threats to our safety or security,</p> <p>15 etcetera.</p> <p>16 You know, they were against it</p> <p>17 because they believed that Google was in,</p> <p>18 like insecure, and Gregg was against it.</p> <p>19 Like Daniel was like open to it, but Gregg</p> <p>20 was against it and he only wanted Outlook.</p> <p>21 And Daniel finally like</p> <p>22 entertained my arguments and allowed me to</p> <p>23 like prove that I thought that Google was</p> <p>24 secure and it was a good platform.</p> <p>25 And so at some point between, I</p>

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<p>1 don't know, I would say July or August of 2 2018 and when I left, I brought in a vendor 3 and Daniel gave the okay. But, you know, 4 other people were against it. And we told 5 them you could still use your Outlook, you 6 could still use, I think it was like 7 Winfield, Mark, several people were like I 8 don't want to learn how to use Google. I 9 said, fine, instead of migrating everything 10 over we are going to keep some people using 11 Outlook. And Gregg was completely against 12 it, to the end, to say that, I don't know, 13 showing proof that I was wrong about that. 14 I would argue to this day that 15 Google bids on Pentagon contracts and 16 everything else. But, anyway, I -- he was 17 super -- he was super like paranoid about-- 18 Q. Do you know my question was: When 19 did you make the switch? The date was all 20 I needed. 21 A. Oh. I don't know. Somebody cut me 22 off here. I'm trying to get -- just tell 23 me when, asked and answered, and then I'll 24 stop. I don't know the date when we -- 25 actually, I know that whatever the --</p>	<p>1 A. Google Calendar, I'm not sure. 2 Google -- I mean, no, you can still access 3 it. It doesn't matter. Any e-mail 4 address, like something at MEForum, like 5 Bennett.MEF@gmail.com could be used to 6 access it, you know. It doesn't have to be 7 like -- 8 Q. Once you made the switch over to 9 the Google suite, then you could use your 10 Bennett@MEF app, if you were using gmail 11 for business. Before that, to access those 12 apps you needed to use a personal gmail 13 account? 14 A. Say it again. 15 Q. You are wearing me out. 16 A. I'm wearing you out? It is 6:00 17 o'clock here. 18 Q. It doesn't matter. All right. 19 A. Look, look, all I can tell you 20 about like data privacy, security, like 21 whatever is this, Gregg was super paranoid 22 about getting hacked and safety of his 23 family. 24 At one time he had me create, 25 record a video that, and in case something</p>
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<p>1 Q. Right before you left, correct? 2 A. Yeah, but I mean, I left in the 3 middle of that switch. There were certain 4 accounts that needed to be like followed up 5 on to see if they were migrated properly. 6 I handed off all the Google relationship to 7 Marnie. She was in contact with the vendor 8 who came to the office to do that audit. 9 And, yeah, so I guess arguably 10 maybe first week of March, last week of 11 February, something like that. 12 Q. Before you made the switch, in 13 order to use Google Docs you had to utilize 14 a personal gmail account, correct? 15 A. Before we made the switch 16 officially? No. Only people that -- only 17 people that -- I mean, like I never asked, 18 I don't know, like other people to use a 19 Google doc. Only the people that would 20 be -- like I asked Stacy, maybe Tricia, I 21 have to share a Google doc that listed -- I 22 don't know what I listed there. Giving -- 23 Q. Google Calendar, Google Docs, you 24 need a gmail account to access those, 25 right?</p>	<p>1 happened to him, and safety, in case he 2 disappeared, I should contact this person, 3 and if he didn't hear from him after this 4 long to contact his wife or connect his 5 wife with this person. And I had to keep 6 the video on my phone until I heard back 7 from him, until he returned. 8 I mean, I don't even know the 9 nature of what he was doing, or traveling. 10 But, I mean, to ask somebody to record a 11 video that in my untimely demise traveling 12 to the Middle East, if I'm going to be 13 kidnaped or whatever -- I'm imagining the 14 scenario of that other guy that he knew 15 that was decapitated, I don't know if by 16 ISIS or whatever, that that was his fear, 17 and that opening the door to Google or 18 whatever, that was his fear, that there 19 would be some window into our ongoing, at 20 the organization, and he didn't want that 21 to happen. 22 Frankly, I don't want that to 23 happen. I was paranoid myself just by the 24 mere fact I was getting postcards from nut 25 jobs blaming me or saying I'm complicit in</p>

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<p>1 the genocide of Palestinian people or 2 whatever. So, yeah, those people are out 3 there. 4 There is some guy, Dr. Frank, 5 that would call the office every week to 6 tell us we were horrible individuals and 7 whatever, these nut jobs. They called all 8 the time. And those were the type of 9 people who, that you are afraid of, not to 10 mention ISIS, who Tweeted the address and 11 put Daniel on the cover of a magazine. So 12 I don't know what more you want me to say. 13 Q. No, that's okay. 14 THE COURT REPORTER: I couldn't 15 hear the end of the answer. 16 A. I had said, before, Mr. Carson said 17 there was like an illegitimate security 18 threat or whatever, but I saw the ISIS 19 Tweet. Eman, who we worked with, had death 20 threats against him. Daniel was on the 21 cover of a magazine. So, I mean, it was 22 like, it was serious. I don't know like to 23 what extent. I know that Gregg was 24 paranoid about it. 25 And maybe I didn't see it at</p>	<p>1 man. 2 A. I am. But I just don't, like there 3 is a lot of truth, I'm trying to give you 4 the full picture of it, but it is like can 5 I -- 6 Q. Well, MEF didn't have any business 7 gmail accounts set up in 2018, right? So 8 if you are using a gmail in 2018, it would 9 had to have been someone's personal gmail 10 account, MattBennett@gmail, 11 SethDCarson@gmail, LisaBarbounis@gmail? 12 A. In this case, can I send, you mean, 13 so you are saying, can I send everything to 14 Daniel's gmail, yep, that's what it looks 15 like I said. 16 Q. Dpipes@gmail, right? Groman@gmail? 17 A. Yeah. 18 Q. Stacy@gmail. 19 A. Yep, yep. 20 Q. Catriona@gmail. You guys all had 21 personal gmail accounts that you used to 22 utilize Google Calendar and Google Docs. 23 That's all I was asking. Right? 24 A. It is more complicated than that. 25 It is like what information is in the</p>
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<p>1 first. And then over time I appreciated 2 the fact that we have a Kevlar door and key 3 card access and data security. I mean, I 4 don't know the data security of I guess 5 where we are going to be, who is traveling 6 where, at what time, what hotel room we are 7 going to be in, all that would be housed in 8 Google and, therefore, the location of 9 Gregg, Daniel, myself and the entire team 10 would then be, would then be there. 11 Q. All right. So let's just move on. 12 When you, when you write here: I mean I 13 can send everything to -- I can send -- I 14 mean can I send everything to and from MEF 15 and use your gmail? 16 When you say "use your gmail," 17 this was back in November of 2018, you 18 would have been talking about personal 19 gmail, correct? 20 A. Like is there context here that I 21 can -- not in the conversation but like, I 22 mean, I don't know where -- what I'm 23 supposed to be like aiming at. Is there 24 like -- 25 Q. You just have to tell the truth,</p>	<p>1 Google Calendar and what information is in 2 the Google Doc. If the Google Doc has 3 information on somebody's name and giving 4 amount, it is different from if they are at 5 Paramount Hotel on a certain date, at a 6 certain time. 7 Q. I'm not suggesting anyone did it in 8 an unauthorized way. I'm saying that you 9 guys were authorized to utilize personal 10 gmail accounts during the time before you 11 had a business gmail suite? 12 MR. WALTON: This is Dave 13 Walton. Objection to form. You can 14 answer, if you can. 15 A. It depends on, it depends on the 16 subject. I know that I was not permitted 17 or instructed, do not use my account, my 18 personal account for official MEF business, 19 confidential, proprietary information. 20 That's what I was told. Never to store 21 that information, never to use it for that 22 purpose. 23 Q. What about Google Docs, making a 24 spreadsheet or something like that? 25 MR. WALTON: This is Dave.</p>

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<p>1 Objection to form again. But you can 2 answer.</p> <p>3 A. It depends what is in the 4 spreadsheet. It depends what is in the 5 Google document.</p> <p>6 If we are talking about the 7 wording that's going to go out in a press 8 release, that was -- which was I think the 9 number one use of the Google Docs, is that 10 we would draft invitations that Tricia 11 would create and that would be mailed out 12 through Mailchimp, and then, or somebody 13 would proofread them, or conference with 14 logistics. I don't know.</p> <p>15 But not like, I don't know, 16 sending messages to the Turkish dissidents 17 in, like over gmail. Or it was like 18 different levels, I mean.</p> <p>19 Q. Well, here Daniel Pipes says: 20 Gmail for me, your personal one too, don't 21 want to leave a trail.</p> <p>22 So he is telling you -- he is 23 telling you to send him an e-mail to his 24 personal gmail, from your personal gmail, 25 because he doesn't want to leave a trail,</p>	<p>1 the man of the year on the cover of the 2 magazine. Like he wanted -- I certainly 3 wouldn't want that. And him being a 4 private person, I'm sure he didn't want it 5 to, you know, infinite level. So, yeah. 6 Yeah.</p> <p>7 Q. But he is telling you, yes, I have 8 all the personal e-mails for all. Do you 9 have a sample?</p> <p>10 Sure. Want me to send via 11 e-mail?</p> <p>12 So what was the sample? Sample 13 of what?</p> <p>14 A. There is not even any context 15 there.</p> <p>16 Q. Mr. Bennett, can I just suggest if 17 you don't know, just say you don't know and 18 we will move on.</p> <p>19 A. No, I don't know. Look, he did 20 things his way, trying to protect us all 21 like from what he was in danger of. I 22 don't know. I'll just start getting to 23 that point. I don't know.</p> <p>24 Am I supposed to be reading 25 this now?</p>
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<p>1 correct?</p> <p>2 A. A trail of what?</p> <p>3 Q. I don't know. You tell me. It is 4 your conversation.</p> <p>5 A. Well, I don't know. The 6 implication seems to be that a trail of -- 7 that somebody would be able to see that I 8 was communicating with Daniel. I don't 9 know. You can ask Daniel.</p> <p>10 Gmail for me, your personal one 11 to, don't want to leave trail.</p> <p>12 That's how he talks. I don't 13 know. Like it was --</p> <p>14 Q. Yeah, cloak and dagger, right?</p> <p>15 A. I mean, not cloak and dagger. But 16 he was like very like brief.</p> <p>17 Q. Seems to me, your personal gmail 18 accounts don't leave a trail.</p> <p>19 A. No. He is a private person. He 20 wouldn't tell me what hotel he was at, what 21 airline he was on, what train he was 22 taking. It was always like, oh, I'll be in 23 this vicinity at this time. I mean, 24 whatever.</p> <p>25 ISIS wanted -- like he was like</p>	<p>1 Q. No, no. Just hold tight. I'll 2 give you a question. I'm just looking at 3 my stuff, trying to get us out of here.</p> <p>4 What is Zapiers? Do you know?</p> <p>5 A. Sorry?</p> <p>6 Q. Do you know what Zapiers is, 7 Z-A-P-I-E-R-S, Zapiers?</p> <p>8 A. It was another one of those 9 connector things that I believe will show 10 up on the audit that I conducted with the 11 vendor to show what was being paid for, and 12 then looked it up. And I believe maybe it 13 connected to Asana, to Salesforce, if I 14 remember correctly.</p> <p>15 It could have been Mailchimp. 16 I remember I had to look it up. But I'll 17 say Salesforce or Mailchimp.</p> <p>18 Q. So do you know, I think you already 19 testified to this, I'll just move it along, 20 Gregg Roman was supposed to be at that 21 November 5th, 2018 meeting, and then Mr. 22 Pipes asked him not to attend; is that 23 right?</p> <p>24 A. I believe so, yeah. I mean, I 25 don't know if it was Daniel who asked him</p>

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<p>1 not to attend, but he wasn't there. No, he</p> <p>2 said at the beginning of the meeting, he</p> <p>3 said, Gregg will not be coming to the</p> <p>4 meeting.</p> <p>5 I remember everybody was</p> <p>6 waiting for him to show up, and then he</p> <p>7 said, "Gregg is not coming." So I don't</p> <p>8 know --</p> <p>9 THE COURT REPORTER: I'm sorry,</p> <p>10 I don't know?</p> <p>11 A. I don't know who told him not to</p> <p>12 come.</p> <p>13 Q. Well, did anyone complain about him</p> <p>14 being there? Was anyone concerned,</p> <p>15 nervous, scared that he would be in</p> <p>16 attendance?</p> <p>17 A. Probably, I mean, probably. If</p> <p>18 they were -- I mean, I was thinking that it</p> <p>19 would be the time to figure out, to prove</p> <p>20 what was, you know, what happened or get</p> <p>21 everybody to hash everything out, you know,</p> <p>22 like in realtime, in front of Daniel, and</p> <p>23 see what -- get to the bottom of it all.</p> <p>24 I mean --</p> <p>25 Q. That's fine.</p>	<p>1 A. Is the question did he deny?</p> <p>2 Q. You said he never told his side of</p> <p>3 the story to you. So he never denied any</p> <p>4 of the allegations that were made against</p> <p>5 him, right?</p> <p>6 MR. WALTON: Objection to form.</p> <p>7 That was not his testimony. This is Dave,</p> <p>8 Eleanor.</p> <p>9 Q. Do you remember him denying?</p> <p>10 MR. WALTON: You can answer it.</p> <p>11 A. No, he did. Of course he denied</p> <p>12 it. I mean, are you talking about to me?</p> <p>13 To them? Whatever.</p> <p>14 Q. To you.</p> <p>15 A. Yeah. He said: How could you, you</p> <p>16 believe these things about me. They are</p> <p>17 not true. And what evidence is there that</p> <p>18 it happened. Banging his hand down on the</p> <p>19 kitchen table as he was, like, how could</p> <p>20 you do this to me. Why would, why wouldn't</p> <p>21 you just have a discussion with me and say,</p> <p>22 did you do this, and let me tell my side of</p> <p>23 the story. And he denied it up and down,</p> <p>24 like until he was blue in the face with me.</p> <p>25 Q. Did you believe him?</p>
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<p>1 A. I would have felt weird about being</p> <p>2 -- I would have felt weird about him being</p> <p>3 there if something like that maybe happened</p> <p>4 to me. But I would want, I would have</p> <p>5 wanted him to be there so I could tell him,</p> <p>6 be, like, you did this, whatever.</p> <p>7 Because he never got to tell</p> <p>8 his side of the story. And then, you know,</p> <p>9 when he came to my house to drop off the</p> <p>10 iPad, like I said before, and I think was</p> <p>11 February, and we got into an argument, and</p> <p>12 he said, "You never let me my side of the</p> <p>13 story. You just, you tried to take me</p> <p>14 down."</p> <p>15 Q. What was his side of the story?</p> <p>16 A. I don't know. I told -- we never</p> <p>17 -- we agreed to just put it in the past, if</p> <p>18 we were going to encounter each other in</p> <p>19 the future at conferences or whatever, you</p> <p>20 know.</p> <p>21 Q. So Mr. Roman never denied the</p> <p>22 allegations here?</p> <p>23 A. What was that?</p> <p>24 Q. Mr. Roman never denied any of the</p> <p>25 allegations to you?</p>	<p>1 A. I mean about what? Everything?</p> <p>2 Q. Do you think he stuck his foot</p> <p>3 under Lisa's ass during the AIPAC</p> <p>4 conference and said: Now that my foot is</p> <p>5 under your ass we should take our</p> <p>6 relationship to the next level?</p> <p>7 MR. WALTON: Objection to the</p> <p>8 form. There is no foundation for that.</p> <p>9 But you can answer, if you can.</p> <p>10 A. I mean, I just heard that for the</p> <p>11 first time. That sounds like a -- no, no.</p> <p>12 The answer is no.</p> <p>13 Q. You don't believe that he did that?</p> <p>14 Why? He is not the type of guy who would</p> <p>15 do something like that? He is too good a</p> <p>16 person?</p> <p>17 THE COURT REPORTER: I'm sorry,</p> <p>18 I couldn't hear it.</p> <p>19 Q. He is not the type of guy who would</p> <p>20 do that? Why do you believe that that</p> <p>21 didn't happen?</p> <p>22 MR. WALTON: Objection to form.</p> <p>23 This is Dave. Hold on, Matt.</p> <p>24 Objection to form. This is</p> <p>25 compound and it is argumentative. But you</p>

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<p>1 can answer it, if you can.</p> <p>2 Q. Why don't you believe -- why do you</p> <p>3 believe it when he denies that?</p> <p>4 A. Why do I believe that he did not</p> <p>5 put his foot on a couch underneath Lisa?</p> <p>6 Q. Yes.</p> <p>7 A. It just seems like a very odd</p> <p>8 thing. I mean I never heard of it. I</p> <p>9 don't know. Somebody like trying to make a</p> <p>10 move on somebody with your foot.</p> <p>11 Q. I thought you read the complaint.</p> <p>12 A. Yeah, but, I mean, I didn't know</p> <p>13 that that was a, I don't know, the line</p> <p>14 that was said.</p> <p>15 I know there was this Gregg</p> <p>16 acting weird on the couch, was explained to</p> <p>17 me that he was acting like a dork. But, I</p> <p>18 mean, now that I'm hearing it I guess in a</p> <p>19 video deposition, it sounds, it sounds</p> <p>20 ridiculous.</p> <p>21 I'm sorry if I'm laughing. It</p> <p>22 sounds like ridiculous. Just like you told</p> <p>23 me there was a couch with Tiffany Lee, did</p> <p>24 I know about the couch. Like, no.</p> <p>25 Q. Did you ever say that you have more</p>	<p>1 hard. If we had meetings all day long, we</p> <p>2 would drink at the end of the day, and, you</p> <p>3 know, try to get our notes and meeting</p> <p>4 followup done at the time.</p> <p>5 Look, I was trying to -- I</p> <p>6 said, yeah, Gregg, the skeletons, I was</p> <p>7 trying to be a tough guy, like I was just</p> <p>8 trying to just show the women that I would</p> <p>9 be able to -- that they could trust me,</p> <p>10 that I would be a good leader, that I would</p> <p>11 be able to take care of the organization.</p> <p>12 And they said: We don't need your</p> <p>13 leadership and we don't need you to protect</p> <p>14 us. That's it.</p> <p>15 Q. What about Gregg Roman telling Lisa</p> <p>16 that he wanted somebody to suck his dick,</p> <p>17 did Gregg deny that to you?</p> <p>18 MR. RIESER: Objection, lacks</p> <p>19 foundation. This is William Rieser.</p> <p>20 MR. CARSON: I think one person</p> <p>21 can make objections. This isn't --</p> <p>22 MR. RIESER: I'm filling in for</p> <p>23 Mr. Gold. Go ahead.</p> <p>24 MR. CARSON: This isn't a team</p> <p>25 sport.</p>
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<p>1 skeletons to tell about Gregg than just the</p> <p>2 sexual harassment?</p> <p>3 A. I tried to say that, you know, if I</p> <p>4 really wanted to take Gregg down I could do</p> <p>5 it.</p> <p>6 Q. What would you do?</p> <p>7 A. Huh?</p> <p>8 Q. What you would do? How would you</p> <p>9 do that?</p> <p>10 A. I really didn't have anything,</p> <p>11 that's the truth.</p> <p>12 Q. Did you lie to him when you said</p> <p>13 that?</p> <p>14 A. Sorry?</p> <p>15 Q. You lied when you said that?</p> <p>16 A. Siri popped up. Say it again.</p> <p>17 Q. Did you lie when you said that?</p> <p>18 A. Yeah, I exaggerated. I</p> <p>19 exaggerated.</p> <p>20 Q. Are you exaggerating today?</p> <p>21 A. About what?</p> <p>22 No, I'm not exaggerating today.</p> <p>23 But, I mean, specifically, if you want to</p> <p>24 say what I'm exaggerating about. But, no,</p> <p>25 Gregg and I were like work hard, party</p>	<p>1 MR. RIESER: Go ahead. Keep</p> <p>2 going.</p> <p>3 MR. CARSON: I'll direct you to</p> <p>4 keep your objections verbal and concise.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. You can answer the question.</p> <p>7 A. Well --</p> <p>8 Q. I'll --</p> <p>9 A. Look, I said before --</p> <p>10 MR. RIESER: Stop interrupting,</p> <p>11 Seth.</p> <p>12 Q. I'll repeat the question if you</p> <p>13 want.</p> <p>14 A. Go ahead. Repeat it, please.</p> <p>15 Q. Sure. Did you believe -- did Mr.</p> <p>16 Roman deny that he asked Lisa to suck his</p> <p>17 dick?</p> <p>18 A. I never asked him did you, did you</p> <p>19 -- there were no opportunity for him to</p> <p>20 deny that to me. I never confronted him on</p> <p>21 anything like that. But --</p> <p>22 Q. So he denied that he was acting</p> <p>23 like a dork, is that your testimony?</p> <p>24 A. I believe that they were there in</p> <p>25 Israel on the couch, and they probably were</p>

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<p>1 drinking, and that was it. But I don't --</p> <p>2 it is hard for me to believe that and I</p> <p>3 have no reason to believe that he would</p> <p>4 like go out there on that level with, you</p> <p>5 know --</p> <p>6 Q. With a colleague?</p> <p>7 A. -- to say, to say something like</p> <p>8 that. He, like he, like if I ever said</p> <p>9 something that was, like even the beginning</p> <p>10 of my employment, that was like, you know,</p> <p>11 even remotely wrong to say, he would say</p> <p>12 no, like, this is, or he would make sure</p> <p>13 that everything was proper, in line.</p> <p>14 And it was him, I'm pretty</p> <p>15 sure, who gave the harassment training,</p> <p>16 long before I left. Again, I think it</p> <p>17 could have been Mark, but I believe</p> <p>18 somebody gave harassment training in 2018.</p> <p>19 I'm sure -- I don't believe it was 2017.</p> <p>20 I'm pretty sure it was 2018.</p> <p>21 Q. So what specifically did Gregg</p> <p>22 Roman deny then when he made these denials</p> <p>23 to you?</p> <p>24 A. I just, everything, I mean, my main</p> <p>25 was like the data and the Salesforce and</p>	<p>1 then all this blew up, and then I feel like</p> <p>2 I was just like poked and prodded to hating</p> <p>3 him. And I did very much so. I wrote him</p> <p>4 a letter and said I can't believe you did</p> <p>5 all these things, I really had no way to</p> <p>6 know if he did do all those things. But,</p> <p>7 you know, I just started to look for any</p> <p>8 possible thing that I could dislike in him,</p> <p>9 and I believe that that is what these women</p> <p>10 did at some point, and just took everything</p> <p>11 that could possibly be said about somebody</p> <p>12 and saying it about him.</p> <p>13 But, I don't know, it is almost</p> <p>14 like Marnie is telling me just imagine</p> <p>15 what, Leah and Gregg in Israel, and it was</p> <p>16 like over and over again, thinking about</p> <p>17 like the same thing. It was like upsetting</p> <p>18 to me.</p> <p>19 Q. How old is Leah Merville?</p> <p>20 A. I mean she was a -- I guess</p> <p>21 graduated from college, or, at the time</p> <p>22 she, of her internship.</p> <p>23 Q. She was 18?</p> <p>24 MR. RIESER: Don't interrupt</p> <p>25 him.</p>
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<p>1 everything, you know, and that was me.</p> <p>2 That wasn't even with the women.</p> <p>3 I said, like you are showing</p> <p>4 here, I thought something was up in</p> <p>5 Salesforce, but it wasn't. But it is like</p> <p>6 everything, whatever, was bundled together,</p> <p>7 everything everybody was saying about him.</p> <p>8 But, I don't know. Like, you</p> <p>9 got to understand, like we went, right up</p> <p>10 until the end, we were going to happy hour</p> <p>11 together, like routinely. Like we were</p> <p>12 going out like routinely. There was</p> <p>13 never -- everybody was like in good --</p> <p>14 everybody was friends. Like it was always,</p> <p>15 like, all right, Gregg is the boss, like we</p> <p>16 never didn't remember that fact. Like</p> <p>17 Gregg is the boss.</p> <p>18 But, you know, I remember the</p> <p>19 last happy hour I believe we went to, he</p> <p>20 said, "I got to leave and go back to the</p> <p>21 office and get work done," and he stayed</p> <p>22 and Tricia, Lisa, somebody else, I don't</p> <p>23 know, Catriona or Marnie or something.</p> <p>24 But, you know, right up until</p> <p>25 the end we were always good friends, and</p>	<p>1 Q. She was 18 years old?</p> <p>2 A. I have no idea.</p> <p>3 Q. How old was she when she started</p> <p>4 working with the Middle East Forum?</p> <p>5 A. How would old is she now? How old</p> <p>6 was she then? I don't know.</p> <p>7 Q. The question was: How would old</p> <p>8 was she when she started working at the</p> <p>9 Middle East Forum?</p> <p>10 MR. RIESER: Seth, I'm going to</p> <p>11 instruct you, please do not interrupt the</p> <p>12 witness.</p> <p>13 MR. CARSON: Your objection --</p> <p>14 MR. WALTON: Objection --</p> <p>15 THE WITNESS: I don't know.</p> <p>16 THE COURT REPORTER: Excuse me.</p> <p>17 THE WITNESS: I don't know.</p> <p>18 Old enough to go to college.</p> <p>19 THE COURT REPORTER: I couldn't</p> <p>20 hear the objection.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Keep the record clear. It is a</p> <p>23 simple question. Yes, or no, or I don't</p> <p>24 know.</p> <p>25 A. I don't know.</p>

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<p>1 Q. How old was she when she began 2 working at the Middle East Forum? 3 A. At this moment, I do not know. At 4 the time I'm sure she would have had to 5 include her birth date or some form of 6 identification in her application. But I 7 do not know. I do not know. 8 Q. Was she an appropriate age for 9 Gregg Roman to sleep with? 10 MR. RIESER: Objection to form, 11 argumentative. 12 Q. Was she? 13 A. I mean, you are asking me is that 14 age appropriate for people to sleep with? 15 Or am I testifying that Gregg Roman slept 16 with her? 17 Q. Do you think it would have been 18 appropriate if he had slept with, if he had 19 sex with her? 20 MR. WALTON: This is Dave. 21 Objection to form. 22 A. As far as I know, the law is the 23 law. Whatever the legal consenting age is 24 is the legal consenting age. So I don't 25 know what the line of questioning is.</p>	<p>1 I don't believe that it happened at this 2 point. 3 MR. RIESER: You harassed this 4 witness enough. 5 BY MR. CARSON: 6 Q. Why don't you believe it happened? 7 A. Did she say that it happened? Show 8 me that she said that it happened, and then 9 I'll believe that it happened. I don't, I 10 don't -- I have nothing to believe that it 11 happened. And that's what came back to me 12 when I'm faced with all these documents 13 that, that came, everybody saying that 14 things happened, but when it came time to 15 ask myself, and I said: Matt, did you 16 actually see that happen? No, I didn't. 17 Did you actually see that happen at AIPAC? 18 No, I didn't. Did you see that happen in 19 Israel? No, I didn't. 20 Did you see Gregg take the 21 proprietary information from Salesforce? 22 No, I didn't. I didn't see it. I had no 23 proof of it. But I believed it because 24 everybody was saying it. 25 Q. Don't you think that's a real</p>
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<p>1 Q. Taking all of the considerations 2 into account, that he was -- 3 A. I don't know. My dad is 82 and my 4 mom is 64 or 65. So, I mean, that's a 5 pretty big age gap. 6 Q. Is your mom an intern and your dad 7 a director of the same organization? 8 MR. RIESER: Object to the 9 form, argumentative. 10 A. I'm just making a point that there 11 is a gap in ages and what the -- 12 Q. So sitting here today, you can't 13 say whether it would have been appropriate 14 for them to engage in a sexual 15 relationship? 16 MR. WALTON: This is Dave. 17 Objection. Objection to the form. 18 MR. CARSON: You can't 19 interrupt. 20 MR. WALTON: You are being 21 abusive and argumentative. This is never 22 coming into evidence. 23 THE WITNESS: You are putting 24 words in my mouth. I can't comment on that 25 because I don't believe that it happened.</p>	<p>1 problem, though, that no one knows, no one 2 talked to her? Did you ever call and ask 3 her if it happened? Did you ever take a 4 statement from her in connection with an 5 investigation into Gregg Roman's sexual 6 misconduct? 7 MR. RIESER: Objection to form, 8 argumentative, compound. 9 A. She never was an employee-- 10 Q. You can answer. 11 A. Did I investigate -- 12 Q. Yeah. Did you ever -- 13 THE COURT REPORTER: Excuse me. 14 Excuse me. I'm going to ask you to just 15 talk one at a time, please. 16 Q. Did you ever call her and ask her 17 what happened? 18 A. No. And say, oh, there is an 19 alleged rumor about you? 20 Q. Yeah. Did Daniel Pipes -- 21 A. No. 22 Q. -- ever call and ask whether it 23 happened? 24 A. I have no way to know that, 25 obviously.</p>

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<p>1 Q. Did Mark Fink ever call and ask if 2 it happened? 3 A. I have no way to know that, 4 obviously. I don't think they are -- 5 Q. Don't you think that's an important 6 component of the investigation into Gregg 7 Roman's sexual misconduct, is witness 8 statements? 9 A. I mean, hold on. What was that? 10 What was the last thing you just said? 11 Q. Don't you think an important 12 component into an investigation into a 13 director of the Middle East Forum's sexual 14 misconduct is obtaining witness statements 15 from the people who were harassed? 16 A. No. 17 MR. WALTON: Listen, this is 18 objection. 19 A. This is a -- 20 MR. WALTON: Matt, Matt, hold 21 on, Matt. Matt, I have to state my 22 objection. Objection. You are badgering 23 the witness. 24 MR. CARSON: It is not an 25 objection.</p>	<p>1 MR. WALTON: Objection to form. 2 Eleanor, this is Dave. Objection to form, 3 to the extent it calls for a legal 4 conclusion that you are asking is expert 5 opinion on sexual harassment investigation, 6 and -- 7 MR. CARSON: I'm not asking for 8 expert opinion. 9 MR. WALTON: It sounds like to 10 me you are. 11 MR. CARSON: No, I'm not. I'm 12 not asking -- 13 MR. WALTON: It was not his 14 responsibility to conduct the 15 investigation. 16 MR. CARSON: Are you testifying 17 now, Mr. Walton? 18 MR. WALTON: No. It is the 19 truth. 20 MR. CARSON: You are objecting 21 to -- 22 MR. WALTON: You can ask 23 Daniel Pipes this question. 24 THE WITNESS: I'm testifying 25 and --</p>
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<p>1 MR. WALTON: There is no 2 evidence that she ever made a complaint. 3 MR. CARSON: Badgering the 4 witness isn't an objection. 5 MR. WALTON: Yes, you are. You 6 are being abusive and you are being 7 argumentative. 8 MR. CARSON: No, I'm not. 9 Go ahead. You can answer the 10 question. 11 MR. WALTON: We will agree to 12 disagree. 13 BY MR. CARSON: 14 Q. You can answer the question. 15 A. What Gregg does in his personal 16 life -- 17 Q. That's not my question. 18 A. -- that's not with an employee is 19 not my business. 20 Q. I didn't ask about his personal 21 life. My question was: Don't you think an 22 important component of an investigation 23 into sexual misconduct is questioning the 24 witnesses, questioning the people who 25 alleged the misconduct?</p>	<p>1 THE COURT REPORTER: Excuse me. 2 I'm not reporting right now. 3 THE WITNESS: If there was ever 4 an allegation made to me by Leah Merville I 5 would have taken proper course of action. 6 Did Leah Merville ever say anything to me 7 other than thanks for the great 8 opportunity, I look her out to lunch the 9 last day that she worked there, we went to 10 the Falafel place that's on 17th Street, 11 whatever it was, Goldie's or whatever it 12 was. She said: Oh, I had an amazing 13 internship, thank you, and goodbye. Like, 14 whatever. 15 No, I had no reason. Leah 16 never contacted me. She knew how to reach 17 me. We were friends on Facebook. Probably 18 still are friends on Facebook, so I'm sure 19 she would know where to find me or where to 20 find me if she had allegations. She 21 brought me no allegations. I had no reason 22 to do any, whatever. 23 Q. You had no reason to what? 24 A. Unless Leah said, hey, Matt, guess 25 what, something happened at MEF, what would</p>

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<p>1 I do about it? She was long gone before 2 someone said, hey, there is a rumor that 3 Gregg did this, and I have no evidence of 4 it. So then when call somebody to tell 5 them somebody else is spreading rumors 6 about them. 7 Q. That's your testimony today. Are 8 you sure you don't want to change it right 9 now? 10 MR. RIESER: Objection, 11 harassing, argumentative. 12 MR. WALTON: Objection. I join 13 in that objection. Seth, you have to stop 14 this. 15 MR. CARSON: You want to -- 16 MR. WALTON: This is way beyond 17 the pale. 18 THE WITNESS: I mean -- 19 BY MR. CARSON: 20 Q. I mean, is that what you think, 21 it's Leah Merville's fault because she 22 didn't report anything when she left; is 23 that your testimony? 24 A. I never said anything was anybody's 25 fault. I'm saying, you're saying don't I</p>	<p>1 A. No. 2 Q. You still don't remember, okay. 3 A. Listen, if there is an NDA with my 4 signature on it that's dated the day before 5 the meeting, then it is there. Do I 6 remember doing it? No, it is two years 7 ago. And I have gone through several major 8 life changes by then. 9 And I've tried to, the day that 10 I left this place I tried to forget 11 everything that ever happened there. 12 Q. Except for Gregg Roman's -- 13 MR. WALTON: This is Dave. 14 Matt, you don't need to explain yourself. 15 You either remember or you don't. It is 16 fine. 17 THE WITNESS: Thanks, Dave. 18 BY MR. CARSON: 19 Q. You remember that Gregg Roman 20 denied everything, right? But you don't 21 remember -- 22 MR. RIESER: Objection, 23 harassing, argumentative. 24 A. Am I answering the question? 25 Q. Well, I'm just, how do you choose</p>
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<p>1 have a responsibility to conduct 2 investigations or whatever. Yeah, if Leah 3 Merville was my employee and she came to me 4 and said, hey, something happened, then I 5 would say, alright, let's get it in 6 writing, let's make a complaint, let's move 7 on to the proper, take the proper course of 8 action. 9 But, no. And as far as I 10 understand whatever was supposed to happen 11 took place, she wasn't with MEF anymore, 12 anyway. So that's as I understand it. 13 Q. Here Daniel Pipes says: Thanks for 14 the signed NDAs. But to make it 15 logistically easier, let's do it again on 16 paper tomorrow. 17 So did you execute another NDA 18 with Mr. Pipes in person, on paper? 19 A. Maybe we signed NDAs in the 20 meeting, I guess. Is that what that means? 21 Q. Yeah. 22 A. If this was the date before the 23 meeting. 24 Q. Yeah. Do you remember whether you 25 signed an NDA before the meeting, now?</p>	<p>1 what to remember and not to remember? 2 MR. RIESER: Objection, 3 argumentative. Objection to form. 4 A. Traumatic things that affected me 5 and scared me I remember. And things that 6 are of no consequence I don't. I don't 7 remember signing a nondisclosure agreement 8 because it didn't matter to me. I knew 9 that that nondisclosure agreement wasn't 10 going to protect me from anything or not 11 protect me from anything. It wasn't, 12 whatever. 13 If my life blew up and I got 14 fired, I would move on, and go get a new 15 job, make new friends and move on with my 16 life. I really didn't care what the 17 nondisclosure agreement said. 18 Q. You didn't express your concerns 19 about the nondisclosure agreement before 20 the November 5th meeting? 21 A. If I did, it was because -- I mean, 22 I may have. 23 Q. Did you? 24 A. I may have, if other people were 25 expressing concerns. I believe, I think</p>

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<p>1 Marnie had the lawyer look at it and the 2 lawyer said, oh, it is bullshit. And then 3 Lisa and Tricia also didn't want to sign 4 it. And then, what was I going to say, 5 like, no, it is fine, just sign it. So I 6 said, oh, maybe I do have concerns. I 7 don't remember, I don't remember. I don't 8 know. 9 Q. So the only reason you expressed 10 concerns is to just, what, because the 11 other women were expressing concerns? 12 A. I'm not the type of person that 13 would, that would care for, like if I was 14 wrong. I don't know what the content of 15 the NDA was. Maybe like don't talk about 16 confidential business at MEF or whatever it 17 said. But it wasn't, it wasn't of 18 importance to me. 19 What was important to me was 20 being told by my friends and colleagues, 21 like, we threw you under the bus, you are 22 with us or against us, take Gregg down, you 23 are a pussy, we don't trust you. That's 24 what I remember. That's what is ingrained 25 in my memory, that the people I called my</p>	<p>1 said, "You are a fucking pussy." And then 2 that was, and that was it. That was the 3 beginning of it. 4 Q. Well, what other comments were made 5 if that was just the beginning? 6 A. That I was like loyal to Gregg. 7 That I didn't try to take -- they said you 8 didn't, why didn't you -- why did you 9 defend Stacy, why didn't you, like why 10 didn't I jump on the bandwagon and try to 11 take Gregg down. 12 So then I did try to take Gregg 13 down. I called the meeting and I told him: 14 You can't talk to anybody. 15 And then Daniel said: Well, 16 why did you do that? And I said: Because 17 the women feel that way. 18 And he said: Hey, women, do 19 you feel that way? 20 And they said: No. Gregg is 21 fine. Matt is nuts. 22 So upon learning that, upon 23 knowing that they are coming to me saying 24 Gregg is terrorizing us, and then I say, 25 all right, I'm going to get Gregg out of</p>
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<p>1 friends for a long time, confided in, 2 socialized with, that they manipulated me, 3 emotionally, when I was at the lowest point 4 in my life, after I had lost a child, after 5 I had gone -- was dealing with personal 6 issues with my wife, and I felt that they 7 manipulated me. 8 And maybe I didn't see it at 9 the time, but I feel like I see it now. 10 And Marnie would be nice to my face, and 11 then shitty behind my back, apparently. 12 And then I started believing that Lisa and 13 Tricia were like that too. And then, and 14 that was it. And it seems like that's the 15 case. 16 Q. Did anyone make any of those 17 comments after the November 5th, 2018 18 meeting? 19 A. Did anybody make comments what? 20 Q. Any of the comments you just 21 testified about at the November 5th, 2018 22 meeting? 23 A. Yeah, that was it. Directly after 24 the meeting we went down to Tir na nOg, and 25 Marnie said, "I don't trust you," and Lisa</p>	<p>1 here, and then I do it, at the expense of 2 my own job, and then they are like, oh, no, 3 we are fine, and Matt is just on a power 4 trip. 5 Yeah, I realize, they are 6 not -- they don't give a shit about me, 7 they are emotionally manipulating me into 8 some, into some other end which either is a 9 lawsuit or is a new position or a new job. 10 And that's it. 11 Q. Well, when did you decide that? 12 When did you decide they were emotionally 13 manipulating you? 14 A. Probably a couple weeks after I had 15 left to go into another organization, and I 16 had some downtime, and I just started to 17 think back. And I said, wait a second, you 18 know, immediately I knew that Marnie, who 19 always I felt just basted me for whatever 20 reason, wanted my job, or a bigger job, or 21 the top job, or whatever. 22 But, you know, I didn't -- I 23 never thought Tricia and Lisa would, would 24 feel that way, or didn't feel that way, 25 like they wanted me gone, removed or they</p>

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<p>1 wanted to report to Daniel directly or 2 whatever. I'm happy to let them do that. 3 My life was easier not reporting to Daniel 4 directly. It was easier not wanting to be 5 the director of the organization. I was 6 happy in my middle management bliss, 7 sending out press releases, scheduling 8 donor meetings.</p> <p>9 I certainly never asked, you 10 know what, I'm going to be a director of 11 the organization. Even when I was asked by 12 people at the organization, well, Matt, 13 what do you want to do with your life? I 14 said I'm happy, I like this place, I like 15 doing the work that I do, and I'm not going 16 to go to seek to be the director of some 17 place, until all of a sudden, everybody was 18 trying to take down Gregg, and, it was 19 like, oh, my God, there is no leadership 20 and we all feel victimized.</p> <p>21 So I tried to save them. And 22 then Marnie said, "We don't need you to 23 save us."</p> <p>24 Q. Do you remember this? Do you 25 remember this, an e-mail that, text message</p>	<p>1 MR. CARSON: You are actually 2 not.</p> <p>3 MR. RIESER: Yeah, I am.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. At the time you testified you 6 believed them?</p> <p>7 A. At what time?</p> <p>8 Q. In November of 2018, right, you 9 believed them at that time?</p> <p>10 A. After they took -- what was the 11 date of this message?</p> <p>12 Q. November 5th, 2018.</p> <p>13 A. Yeah. So just to make sure I 14 understand what is going on, after the 15 meeting I'm saying some of the women in the 16 office expressed disappointment in me for 17 not going after Gregg more aggressively. I 18 understand...</p> <p>19 And you are saying did I 20 believe them. I mean, believe means 21 something relative.</p> <p>22 Q. That's not what I said I said.</p> <p>23 MR. RIESER: Matt, don't 24 interrupt him again.</p> <p>25 Q. My question is: You testified</p>
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<p>1 you sent? This is November 5th, 2018.</p> <p>2 A. Yep. I mean, yep.</p> <p>3 Q. Why were you more concerned with 4 what Daniel Pipes wanted than with what the 5 woman that were sexually harassed and 6 abused wanted?</p> <p>7 MR. RIESER: Objection, 8 argumentative. Objection to form?</p> <p>9 Q. You can answer.</p> <p>10 A. You saying they are sexually 11 harassed and abused is I think --</p> <p>12 Q. At the time you believed them, 13 right.</p> <p>14 MR. RIESER: Objection. Don't 15 interrupt him.</p> <p>16 Q. At the time you believed them, 17 right?</p> <p>18 A. At the time --</p> <p>19 Q. You testified that at this time --</p> <p>20 MR. RIESER: Don't interrupt 21 him.</p> <p>22 Q. Is that right?</p> <p>23 MR. RIESER: Seth, Seth, stop 24 badgering the witness, stop interrupting 25 him, or I'm going to end this deposition.</p>	<p>1 earlier today that at this time you 2 believed the women, you believed their 3 allegations, correct? That was your 4 testimony earlier today, correct?</p> <p>5 A. I believe -- no, I didn't say I 6 believed what they said happened actually 7 happened. I believed that they were 8 at like a point where they were serious 9 about, about it.</p> <p>10 Like all the facts, I'm not 11 sure if I knew even all of the facts at 12 that point, I mean about the thing about 13 the foot on the couch, and like I don't 14 even know if I knew the details of that at 15 that point.</p> <p>16 Q. You knew enough that --</p> <p>17 A. Like, listen, I considered myself 18 as custodian of the organization, that I 19 was responsible for Daniel, for the 20 reputation of the organization, for myself, 21 for the people who worked for me, and 22 everybody else.</p> <p>23 I'm proud to have my name 24 written there, and my consideration at that 25 point, I was more concerned with what you</p>

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<p>1 want and my -- it is not binary. It is 2 not, well, I can be concerned for the woman 3 or I can be concerned for Daniel and the 4 organization. I was concerned for 5 everything because I saw the walls falling 6 down around me. 7 Q. Did you express that concern for 8 everything in this text that you sent to 9 Daniel? 10 A. What text? Which one? 11 Q. The that one I highlighted. 12 A. The one highlighted. 13 Q. Yeah. Did you express that concern 14 for everything in this text? 15 A. Maybe I didn't write it to him. 16 But several times I told him that, you 17 know, I care deeply about the organization, 18 the organization, the organization. I'm 19 pretty sure that I imparted that more times 20 than I can remember. 21 Like you are showing me a 22 message. Do you know how many 23 conversations I had with Daniel and e-mails 24 and in-person interactions? Like you are 25 taking down one text message to distill it</p>	<p>1 concerned with what you want, I mean, he is 2 the president of the organization. Does he 3 want everybody to get along and hold hands? 4 Does he want just Gregg gone? Does he want 5 to restructure the organization? Does he 6 want to put up, implement new work flows 7 and protocols to make sure that some people 8 are not going to be talking to other 9 people? 10 Q. Which one of those is accurate? 11 You are here -- 12 MR. WALTON: Objection to form. 13 You can answer. 14 Q. You just made up a whole bunch of 15 hypotheticals. We are not here today to 16 talk about hypotheticals. We are here 17 today to talk about the truth. 18 MR. RIESER: Objection. 19 MR. WALTON: Objection to form. 20 Q. Which one is it? 21 A. There were multiple 22 considerations -- 23 MR. RIESER: Objection to form. 24 A. -- people working there that had no 25 part in any of this, don't want them to be</p>
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<p>1 down and say, well, I didn't care about the 2 women. 3 Q. No, but you wrote in this e-mail 4 that you were more concerned with what 5 Daniel wanted than what the women wanted, 6 correct? That's what you said in this 7 e-mail, in this text message? 8 A. That's what is written. That's 9 what is written. 10 Q. Why? 11 A. I can only explain to you 26 months 12 later -- why? 13 Q. Yeah, why at that time were you 14 more concerned with what Daniel wanted than 15 what the women wanted, at a meeting that 16 was held to discuss allegations of sexual 17 harassment? 18 A. I don't know. Now you are saying 19 it is not a trick question. I feel like it 20 is definitely a trick question. I don't 21 know what you are trying to like -- like 22 this wasn't the only thing that was 23 discussed between Daniel and I on the 24 phone, in the text messages. 25 When I'm saying I'm more</p>	<p>1 negatively impacted by what was happening, 2 staff that had no idea what was going on or 3 weren't involved, didn't want their job to 4 be jeopardized to the people that I held 5 higher, to writing fellows and the rest of 6 the organization, should they all be 7 impacted by it? No. That's how I felt as 8 a custodian of the organization. That's 9 how I felt making sure that the walls 10 weren't falling down. 11 Q. So when five women come together to 12 complain about one employee's misconduct 13 and harassment, you think the concern of 14 the organization should be everyone but the 15 women? Is that your testimony? 16 MR. RIESER: Objection to form. 17 MR. WALTON: Objection to form. 18 MR. RIESER: Matt, Matt -- 19 THE WITNESS: The organization 20 fell apart because of lies and then -- 21 THE COURT REPORTER: Excuse me. 22 Excuse me. 23 MR. RIESER: Matt, you got to 24 wait until we finish our objections before 25 you start your answer. Okay?</p>

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<p>1 THE WITNESS: Okay. Sorry.</p> <p>2 MR. RIESER: Go ahead.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. I'm just trying to understand your</p> <p>5 testimony.</p> <p>6 A. I don't think -- it is a riddle.</p> <p>7 Q. What do you think the number one</p> <p>8 consideration of the organization should be</p> <p>9 at a meeting that's held to discuss</p> <p>10 multiple women's allegations of sexual</p> <p>11 harassment, sexual misconduct and sexual</p> <p>12 abuse?</p> <p>13 MR. RIESER: I'm going to --</p> <p>14 hold on.</p> <p>15 A. It takes --</p> <p>16 MR. RIESER: I'm going to</p> <p>17 object to form, it is argumentative. It</p> <p>18 calls for a legal conclusion. Go ahead.</p> <p>19 Q. What do you think the number one</p> <p>20 consideration in this organization should</p> <p>21 be, as someone who was in management, as</p> <p>22 someone who was involved in this report, as</p> <p>23 someone who was at the meeting, what do you</p> <p>24 think the number one priority should be?</p> <p>25 MR. WALTON: Objection to form</p>	<p>1 A. That I thought there was a data</p> <p>2 breach and I wasn't sure if it was Gregg.</p> <p>3 I didn't know what was happening. I had to</p> <p>4 get to the bottom of it.</p> <p>5 Q. The meeting was called to talk</p> <p>6 about a data breach?</p> <p>7 A. No, it wasn't. The meeting was</p> <p>8 called to talk about everybody's gripes</p> <p>9 with Gregg.</p> <p>10 Q. Gripes, that's the word you are</p> <p>11 going to use?</p> <p>12 A. Well, they weren't complaints</p> <p>13 because if they were, as I told you, I</p> <p>14 would have asked them to put them in</p> <p>15 writing.</p> <p>16 Q. They were not complaints. So when</p> <p>17 you say you understand what they wanted,</p> <p>18 but you were more concerned with what</p> <p>19 Daniel Pipes wants, what did Daniel Pipes</p> <p>20 want? Did he tell you that?</p> <p>21 A. No, Daniel Pipes did not tell me</p> <p>22 what he wants.</p> <p>23 Q. How did you know what he wanted?</p> <p>24 A. I didn't know what he wanted.</p> <p>25 Q. How could you be concerned with it?</p>
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<p>1 and compound.</p> <p>2 Q. You can answer. Is it the safety</p> <p>3 of the women?</p> <p>4 A. The safety --</p> <p>5 MR. WALTON: Objection to form.</p> <p>6 Q. What do you think?</p> <p>7 A. If you can state the question in</p> <p>8 one coherent sentence, I'll answer it to</p> <p>9 the best of my ability.</p> <p>10 Q. I would be happy to rephrase it.</p> <p>11 A. Please rephrase it.</p> <p>12 Q. So MEF held a meeting on November</p> <p>13 18th -- November 5th, 2018, correct?</p> <p>14 A. Yes.</p> <p>15 Q. What do you think the number one</p> <p>16 priority at that meeting for Daniel Pipes</p> <p>17 should have been?</p> <p>18 A. To keep the organization from</p> <p>19 exploding with accusations and boiling over</p> <p>20 gripes, which I believe he did by banning</p> <p>21 Gregg, vanishing Gregg from the office</p> <p>22 until he could get to the bottom of what</p> <p>23 was being alleged by everyone, including</p> <p>24 myself.</p> <p>25 Q. What did you allege?</p>	<p>1 A. Because he controls the fate of my</p> <p>2 employment as the president of the</p> <p>3 organization. And it should be obvious. I</p> <p>4 mean, you know, there is -- there was</p> <p>5 complaints about annoying donors, Dr.</p> <p>6 Stein. There was complaints about -- I</p> <p>7 mean, it was all kinds of stuff.</p> <p>8 Actually, that was another one</p> <p>9 of my complaints. Why did Gregg remove me</p> <p>10 from the conversation with this specific</p> <p>11 donor. You know, I also had complaints.</p> <p>12 THE COURT REPORTER: Excuse me.</p> <p>13 I'm going to need a break.</p> <p>14 MR. RIESER: Seth, how much</p> <p>15 longer have you got? We are like over</p> <p>16 seven hours at this point.</p> <p>17 MR. CARSON: No, we are not.</p> <p>18 We are nowhere near seven hours.</p> <p>19 MR. RIESER: Well, you take a</p> <p>20 smoke break and a phone call.</p> <p>21 MR. CARSON: We are nowhere</p> <p>22 near seven hours.</p> <p>23 MR. RIESER: You are going to</p> <p>24 keep going to seven hours? Go ahead.</p> <p>25 THE WITNESS: Can I get an ETA</p>

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<p>1 to like give to my --</p> <p>2 THE COURT REPORTER: I can't</p> <p>3 hear.</p> <p>4 MR. CARSON: Someone is making</p> <p>5 a lot of noise in the background.</p> <p>6 MR. WALTON: Seth, when is this</p> <p>7 going to end?</p> <p>8 MR. CARSON: I mean, I'll let</p> <p>9 you know when I get to my last question.</p> <p>10 MR. RIESER: You can't give us</p> <p>11 an estimation?</p> <p>12 MR. WALTON: Seth, as a</p> <p>13 professional -- wait. Can we go off the</p> <p>14 record so Eleanor can take a break? Can we</p> <p>15 go off the record so Eleanor can take a</p> <p>16 break?</p> <p>17 MR. CARSON: Of course.</p> <p>18 MR. WALTON: We are off the</p> <p>19 record, Eleanor. You don't have to take</p> <p>20 this down.</p> <p>21 (Recess taken.)</p> <p>22 THE VIDEO SPECIALIST: Are we</p> <p>23 ready?</p> <p>24 BY MR. CARSON:</p> <p>25 Q. All right, Mr. Bennett, the next</p>	<p>1 else, or especially after -- I didn't know</p> <p>2 which way was up, quite simply.</p> <p>3 Q. That was it? That's why you were</p> <p>4 emotional, you just didn't know which way</p> <p>5 was up?</p> <p>6 A. I was also disturbed by like all of</p> <p>7 a sudden that there is, suddenly everybody</p> <p>8 together at the same time is having</p> <p>9 traumatic stories, that, with all different</p> <p>10 accounts and details, and being hit with it</p> <p>11 simultaneously, yeah.</p> <p>12 Q. So it was because you didn't know</p> <p>13 which way was up and because you were hit</p> <p>14 simultaneously with all the stories of</p> <p>15 different accounts; is that your testimony?</p> <p>16 A. Yeah.</p> <p>17 Q. Is there any other reason why you</p> <p>18 were so emotional for the last three days?</p> <p>19 A. Aside from having to -- having lost</p> <p>20 a child a couple months previously, and</p> <p>21 then drinking myself to death in the</p> <p>22 following months, no. That's about it.</p> <p>23 Q. When you texted Mr. Pipes about</p> <p>24 being emotional for the last three days,</p> <p>25 you weren't referring to your child or</p>
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<p>1 thing I'm going to show you is here. You</p> <p>2 texted this to Mr. Roman on, I'm going to</p> <p>3 guess, but I'll bet you I'll be right,</p> <p>4 November, November 4th, November 5th,</p> <p>5 November 6th, so November 6th, 2018, the</p> <p>6 day after the D Day meeting, you texted Mr.</p> <p>7 Pipes: You can add that when faced with no</p> <p>8 other choice I had to tell my wife last</p> <p>9 night why I've been so emotional for the</p> <p>10 last 3 days.</p> <p>11 So what did you tell your wife?</p> <p>12 Why were you so emotional in the last three</p> <p>13 days? You don't have to say the</p> <p>14 conversation you had with your wife. My</p> <p>15 question is: Why were you so emotional for</p> <p>16 the last three days?</p> <p>17 A. I didn't know what was -- I had no</p> <p>18 command of the future. Bluntly put.</p> <p>19 People wrote things about me, put my job</p> <p>20 and everybody's job in scrutiny and</p> <p>21 jeopardy. And I didn't know what was</p> <p>22 coming next.</p> <p>23 I didn't know -- I didn't even</p> <p>24 know at that point if, whatever, like</p> <p>25 Marnie would go to Daniel and say something</p>	<p>1 drinking; you were referring to work,</p> <p>2 though, right?</p> <p>3 A. Sorry, hold on one second. Yeah?</p> <p>4 Sorry about that. What was the</p> <p>5 question?</p> <p>6 Q. You weren't referring to -- you</p> <p>7 were referring to work when you talked</p> <p>8 about the last three days of being</p> <p>9 emotional, right, everything that happened</p> <p>10 at work? This was November 6th, right?</p> <p>11 A. Yeah.</p> <p>12 Q. Yes. Okay.</p> <p>13 A. Well, I was emotional with my wife,</p> <p>14 I was emotional for the last three days at</p> <p>15 home, obviously, because of things, yeah,</p> <p>16 compounded with things going on at home and</p> <p>17 work.</p> <p>18 Q. And by the accounts and stories you</p> <p>19 were talking about Lisa Barbounis' account</p> <p>20 and story, and Patricia McNulty's account</p> <p>21 and story, and Marnie Meyer's account and</p> <p>22 story, correct?</p> <p>23 A. Yeah. I mean maybe more. I don't</p> <p>24 remember what else was said in that</p> <p>25 November meeting, whatever. But, yeah.</p>

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<p>1 Q. Daniel Pipes says: Can you put 2 together in a single note for me to quote? 3 A. Mm-hmm. 4 Q. Did you do that? Did you write a 5 single note for him to quote? 6 A. I mean, isn't it there below? 7 Like, I don't know. 8 Q. Is it? You show me. 9 A. I don't know. Scroll down. 10 Q. You said: Okay. And you said: 11 Mail or Telegram? 12 He says: As you like. Here is 13 fine. 14 And then you said: I would 15 like to limit my interactions with Gregg to 16 MEF e-mail and Slack-related only to work 17 and not the unpleasanties or anything 18 else. I'm sorry for any difficulty this 19 might cause and understand that I am an 20 at-will employee, that I am at-will 21 employed, but when faced with no other 22 choice, I was forced to tell my wife 23 everything that was happening, and her 24 disappointment in me as a man and leader 25 has completely crushed me.</p>	<p>1 read my opponent, and be intuitive, and be 2 smart, and have, understand if people are 3 going through a certain situation and be 4 the, you know, the one to, at a family 5 engagement, you know, to bring calm, if 6 people are arguing about politics or 7 everything like that. 8 And suddenly here was a 9 situation that it was like I'm just an 10 idiot who had no control of the situation. 11 And I had no control of our future, and I 12 had no control, therefore, of income and 13 our stability and my livelihood. 14 Q. What part of the situation didn't 15 you have control over? What are you 16 talking about here? 17 A. The entire situation. I didn't 18 know what was going to happen at work once 19 all of this went down. 20 Q. None of this had anything to do 21 with you, right, on November 2018? 22 A. Well, first of all, I mean, I don't 23 know what we are going into here, but 24 conversations with my wife are privileged. 25 But the point is here, is I</p>
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<p>1 What did you mean by that? 2 A. Well, it was several components 3 there. And number one is I wanted, I 4 wanted Gregg to see that, to know that, how 5 upset I was or affected that I was. 6 And also, she didn't, she 7 didn't -- she didn't believe it. She said 8 the entire time she thought Marnie was a 9 liar, and she believed that she was like 10 never my friend to begin with, that was 11 just her natural instinct of her from the 12 beginning. 13 So, but, yeah, I wanted, more 14 than anything I wanted Gregg to know that 15 work was now bleeding into my personal 16 life, which he had full details of, was 17 crumbling. 18 Q. Your wife was disappointed in you 19 because she didn't believe Marnie Meyer? 20 A. S. 21 He was disappointed because I 22 usually had my finger on the pulse of every 23 situation that I'm in. I can tell you what 24 people are most likely, pride myself in my 25 ability to sit down at a poker table and</p>	<p>1 wanted Gregg to know that my wife was 2 disappointed in me. I'm not sure why I'm 3 talking about conversations with my wife. 4 Q. Well, I'm asking you about your 5 testimony right now. 6 A. What is the question? 7 Q. What didn't you have -- you said I 8 usually had my finger on the pulse of 9 things and my arms wrapped around things. 10 What does that have to do with anything 11 that had to do with the November 5th 12 meeting? 13 A. Because no one told me anything 14 until, until the final hour. Said, oh, my 15 God, I'm traumatized from AIPAC. And, oh, 16 my God, I'm traumatized from Israel. And 17 Gregg works us too hard, he's -- and I'm 18 afraid of him because he is big and because 19 he is tall and because, I mean, a million 20 people are complaining, and all of a sudden 21 I'm like, oh, you guys are all unhappy in 22 your work, but my perception, we are going 23 out to happy hour, everybody is going along 24 with their lives and everything is fine. 25 And then suddenly, boom.</p>

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<p>1 And then months later, boom, I 2 feel like an idiot again because now I'm 3 thinking they are all lying to me or they 4 all did lie to me, make me look stupid in 5 front of Daniel. Meanwhile, they are all 6 out doing their own things and Tricia is on 7 dating apps and getting on with her own 8 life, and Lisa is having affairs with 9 whoever else in London, Australia, and 10 whatever. 11 And all of a sudden, like, 12 there is this little microcosm of whatever 13 happened several months ago, like they blew 14 up the whole organization, and my life 15 included in it. And now my life is bundled 16 into that, and now my fate is being decided 17 by that, how Daniel is going to react to 18 that. 19 Q. What does whether Patricia was on a 20 dating app have to do with anything? 21 A. Well, it seems like everybody's 22 lives were fine. Everybody was out, 23 enjoying themselves, holiday parties. Like 24 life was good. Life was fine. And 25 suddenly it wasn't. Suddenly life was bad.</p>	<p>1 are harassed, and now all of a sudden we 2 are abused and we can't -- our lives are in 3 disarray and everything is horrible. 4 Everything wasn't horrible. 5 Everything was fine. Everybody was going 6 out. Everybody was having, got a good 7 social life, and as far as I know 8 everybody's personal lives were good, good 9 enough to be traveling overseas to London. 10 Gregg or Lisa and Tricia to go in Tommy 11 Robinson things, interacting with MEF 12 vendors, sleeping with people. 13 Wasn't, these weren't -- that 14 wasn't the activity of somebody who has 15 been traumatized or whatever. Somebody who 16 is feeling that would say I need to report 17 this or do something about it. 18 I feel like defrauded. Like I 19 feel like, you know, I was used as pawn, as 20 a chess player, I was used as a pawn, moved 21 across the board until -- and maneuvered 22 around until desired out. I'm game. Maybe 23 that was my resignation. Maybe that was 24 Gregg coming back. I don't know. I don't 25 know.</p>
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<p>1 Suddenly Gregg was an abuser. And suddenly 2 their interactions with him were like, like 3 traumatic. Like, I'm telling you, in went 4 from zero to 60 in the blink of an eye. 5 And I felt like, well, I must 6 have missed something. And then as time 7 went on it felt like, like they switched 8 back. It was like, now that Matt wants 9 Gregg gone now, I'll tell Daniel we really 10 don't really care if Gregg is here, Matt is 11 the crazy one. We got Gregg out of the 12 office. Now let's make Matt look stupid, 13 and then suddenly we will be reporting to 14 Daniel directly and we will be in line to 15 either become director or another position 16 or whatever. I don't know -- 17 Q. So you -- 18 A. I don't know what their intent was, 19 but, at that time, but when I received 20 documents that you had delivered to me 21 which suddenly said there is lawsuits, 22 people are seeking millions of dollars, I 23 thought to myself, well, now that does make 24 a little bit more sense, doesn't it. It 25 does make sense now that, oh, suddenly, we</p>	<p>1 Q. You are the victim? 2 A. I just wanted to get away from it 3 and put it behind me. 4 Q. You are the victim, Mr. Bennett? 5 A. The victim? 6 Q. Yeah. Are you the victim in all 7 this? 8 MR. WALTON: Objection to form, 9 argumentative. 10 A. I don't know. 11 MR. CARSON: It is not 12 argumentative. 13 A. I'm a manipulated pawn in all of 14 this, obviously. Here, we'll throw Matt a 15 going away party and tell him that he was 16 the greatest boss we ever had, on his last 17 day at MEF, and then a month later, boom, 18 we will say that he is responsible because 19 he never reported our accusations and 20 allegations that we came to him with, which 21 we actually never came to him, suddenly he 22 is complicit in aiding and abetting people 23 for doing all these horrible things. 24 No. I don't buy the narrative. 25 I don't believe -- I'm sorry. I don't</p>

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<p>1 believe it. I don't believe it. It 2 doesn't make sense to me, because I lived 3 it. I was there. They were all out. They 4 were all having fun. We were friends. We 5 socialized. We went to each other's 6 birthday parties. Tricia babysat my 7 daughter. She held my newborn maybe in her 8 arms in my house. She was, I considered 9 her a very good friend. I considered Lisa 10 very good friend. 11 I considered her husband a 12 friend. He gave me some parenting tips, 13 some husband tips. 14 And this is, and this is what 15 it came down to. Not even, hey, Matt we 16 want you to know that we are disappointed 17 in you, and, I don't know, file a lawsuit, 18 whatever. Not a conversation, un-friend 19 from Facebook, never hear from me again, 20 and then name you as, in a lawsuit, which 21 bundled with the whole bunch of horrible 22 shit to go online can affect my reputation, 23 my ability to earn money, my ability to 24 progress throughout my career. 25 You have people claiming, oh,</p>	<p>1 everybody. I really did want just the best 2 for the organization. 3 And I really believed I was 4 going to be a good leader, I was going to 5 get everybody everything they wanted, 6 smooth everything over, smooth everything 7 over, put everything back on course. 8 And, no, that's not the way it 9 turned out. If they had just taken my back 10 when they said that they wanted Gregg gone, 11 and I said, yeah, Daniel we also don't want 12 to communicate with Gregg. But, no, why 13 would they tell Daniel that they are okay 14 communicating with Gregg over the phone or 15 over Telegram or whatever it was, and that 16 I was acting crazy and obsessed with taking 17 him down? Why would they do that? 18 Then why would they invite him 19 back? Even if I suggested, hey, it could 20 be good for you guys if you got Gregg back, 21 why would they invite him back? Why would 22 they throw me a going away party? I don't, 23 I don't -- I can't buy it. 24 Want me to sit here, I would be 25 lying if I told you that I did believe it</p>
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<p>1 my career, my career, my career. Ruined my 2 career. 3 Q. Again -- 4 A. What about my family? What about 5 by kid? What about my unborn daughter? 6 What about my wife? What did they do? 7 All I tried to do was help 8 every single one of those people, every 9 single one of them. I taught them 10 everything I knew. 11 I tried to get them, right up 12 until my last day, tried to get them 13 raises, promotions, as much money as 14 possible. And it crushed me to see those 15 documents and the lies that they wrote 16 about me. And there by reading that, yeah, 17 I associated that with all the things they 18 said about Gregg, and I said, if they are 19 willing to do that to me, then why wouldn't 20 they do that to him, why wouldn't they do 21 that to anybody. 22 Q. You sound mad. 23 A. Mad? It is, it is so hurtful to 24 think that like, that I, I really did, I 25 really did want just the best for</p>	<p>1 because I don't, I don't believe it. 2 So I don't know. I don't know 3 how else to phrase it. My utter, just 4 being crushed by people that I confided 5 intimate details of my life with and that 6 confided, they confided details with me, 7 and then who gives a shit about Matt. 8 Q. If only they would have got your 9 back, right? That's your testimony? 10 THE COURT REPORTER: I'm sorry? 11 Q. If only they would have got your 12 back? Right? 13 A. If only they would have had my 14 back? No, if only they would have just, if 15 only it was like a logical progression of 16 actions and feelings and emotions. But it 17 wasn't logical because it was, like, Matt 18 didn't take down Gregg, we want Matt to 19 take down Gregg, Matt tries to take down 20 Gregg, but then we don't need Matt to take 21 down Gregg. It was like back and forth. 22 And then, oh, Matt is leaving. 23 Let's invite Gregg back. I am sorry. I'm 24 sorry, I just -- it is not, it is not, it 25 is not a truthful progression of somebody</p>

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<p>1 with those feelings, somebody who was 2 abused, that they are going to go on and 3 say, like, everything is okay. It is not 4 okay. It is okay. It is not okay. 5 It is either okay or it is not. 6 You can't cry wolf after the fact and then 7 say I didn't cry wolf, or I'm not crying 8 wolf, and then I'm crying wolf again. I 9 don't know how...</p> <p>10 I don't know what to say. Now 11 I think back and I think back, I'm like, 12 oh, what was -- what things should have 13 been an alarm for me. Like what things 14 say, Matt, should have raised a flag. Like 15 maybe it was when they had me call my own 16 friend from childhood that Tricia was 17 apparently -- had dated and pretend they 18 weren't listening to the phone call, even 19 though he knew that they were on the phone 20 call.</p> <p>21 Maybe it was when Lisa told me 22 she was having an affair, she wasn't having 23 an affair. But then she did hurt her eye. 24 She said, oh, my God, she told me that. 25 And she hurt her eye. Whatever.</p>	<p>1 everybody in the organization to wage the 2 most horrific things possible, all at the 3 same time. That's what it says. That's 4 exactly what happened.</p> <p>5 There is no shortage of, even 6 like Delaney saying she brought pepper 7 spray because she was afraid of Gregg. I 8 can't believe that people were physically 9 afraid of Gregg. I can't buy it. Like I 10 don't believe that anybody would say, oh, 11 Gregg intimidated me with his size and his 12 weight, and bundled together with 13 everything else I saw. And that Lara, and 14 Laura and Tiffany and everything, this was 15 all put together and strung up and to make, 16 to write a narrative that says the 17 organization was a way that it wasn't.</p> <p>18 You know, I'm sorry things 19 didn't work out for the people who remained 20 there after I left. I really am. I tried, 21 I said, I said, if you want to work at ZOA, 22 I'll see if I can hire you when I get 23 there. Lisa expressed interest in that. 24 Tricia expressed interest in that. 25 Catriona, Delaney wanted to rent my house.</p>
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<p>1 All these things, I should have 2 just started adding it up.</p> <p>3 Maybe it was when, on my last 4 day when Lisa called Marnie and she is 5 screaming, you took money out of my pocket, 6 and whatever, maybe how did I not know that 7 Marnie needed more money or felt that she 8 was underpaid or whatever.</p> <p>9 Like, yeah, I feel like a 10 stooge. I feel like I was a pawn, pushed 11 across the chessboard for somebody who 12 cheated, ultimate end. I don't know who 13 the player is on the other side, if it is 14 Marnie, or Lisa or whoever. But I don't 15 buy these stories that all of a sudden they 16 came out to say that they felt so 17 terrorized and assaulted and everything.</p> <p>18 I just -- it should have been 19 stated as soon as that happened, it should 20 have been the day after, the week after, 21 like whatever. Not months in the future, 22 all at the same time, to set off a bomb.</p> <p>23 If someone said, hey, how could 24 you orchestrate the take-down of an entire 25 organization, say, well, let's get</p>	<p>1 Right up until I left and I was gone, 2 everything was fine. Then it wasn't.</p> <p>3 Q. Are you finished?</p> <p>4 A. Well, I'm just trying to get -- I 5 mean, you are asking me for my testimony, 6 that's my testimony, is that I feel like 7 this is, I was used as, manipulated and 8 used as a pawn, and now you are looking at 9 all these things that are written about me 10 saying, like, who is this terrible guy who 11 didn't take the mental wellbeing and 12 welfare and safety and security of the 13 women in the office seriously, when really 14 that's all I did from the beginning, was 15 try to make sure everybody was happy, 16 everybody was getting what they wanted, try 17 to get them the time off, vacation, as much 18 money as possible, make them look good, 19 give them credit, write an article. Hey, 20 Catriona, here is an article, show it to 21 Daniel, say you wrote this. It will be 22 good, and publish an article in your name.</p> <p>23 Hey, Tricia, look, let's 24 create, calculate the statistics, how many 25 events did you organize, how many events</p>

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<p>1 did Eman organize. Look how much better 2 you are at your job than the previous 3 person who had their job, that's an 4 accomplishment. Use that to get them more 5 money. I was always trying to help and 6 improve. Always. 7 And now I got to relive 8 something that I ran as fast as I could get 9 away from, so other people could be paid 10 millions of dollars. Is that fair? 11 Q. What possibly could be you be 12 referring to that you saw that had millions 13 of dollars written in it? 14 A. I don't remember, but I think that 15 there was a -- I think I asked at some 16 point, what the hell is going on, to maybe 17 Dave and said, well, there is these 18 lawsuits and -- 19 MR. WALTON: Don't talk, Matt, 20 don't talk about any conversations you had 21 with me. 22 THE WITNESS: Okay. 23 MR. WALTON: Or Sid, okay, or 24 Bill. 25</p>	<p>1 is about a case that has already settled or 2 resolved. Has nothing to do with this 3 case. 4 A. Well, be it what, whatever it is, 5 I'm sure that there is something in there, 6 and I'm sure you are going to financially 7 profit from it. So basically here you and 8 all the people that are on there are now 9 going to profit off my traumatic experience 10 in the last three months, having gone 11 through the worst year of my life, and 12 suddenly everybody else is better off for 13 it. Oh, except for the people that had 14 lies told about them. 15 Q. If only it were so. 16 So you have never seen any 17 document that represented that Lisa or 18 Patricia or any of the plaintiffs were 19 trying to obtain millions of dollars; is 20 that correct? 21 A. Document? 22 Q. Yes. 23 A. No. 24 Q. Did Daniel Pipes tell you that? 25 Did Daniel Pipes tell you that they are</p>
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<p>1 BY MR. CARSON: 2 Q. That one you got to follow. So 3 don't tell me about conversations with your 4 lawyers. 5 But like what documents, can 6 you remember a document? Because I'll 7 represent to you there has never been a 8 single document in this case that said that 9 any of these women were after millions of 10 dollars. 11 A. Didn't your website say that you 12 won hundreds of millions of dollars? Isn't 13 that like your claim to fame? I mean, come 14 on. 15 Q. Has nothing -- 16 A. What are we doing? Trying to set 17 the record, the lawsuits are just going to 18 set the record straight. There is no 19 financial gain in it for anybody. 20 Q. Anything that's written about a 21 lawsuit are about cases that have already 22 settled or -- 23 THE COURT REPORTER: I'm sorry, 24 I can't hear you. 25 Q. Anything that you read on a website</p>	<p>1 after millions of dollars? 2 A. I haven't spoken with Daniel since, 3 since I left MEF. I asked for a 4 recommendation letter, which he didn't even 5 send to me. He sent it to the employer, 6 the organization that I applied to. But 7 that was my only interaction with Daniel. 8 So he certainly did not tell me women are 9 after millions of dollars. 10 Q. What about Gregg Roman? Was that 11 something you talked about with him? 12 A. I talk to Gregg probably once a 13 month, maybe twice a month. 14 Q. Did he tell you that my clients are 15 trying to get millions of dollars? 16 A. Believe it or not, I had to promise 17 I would never speak with Gregg about 18 anything that's happened in the past. 19 Q. You mean with regard to this 20 lawsuit? 21 A. About anything that, that had taken 22 place before, before I left MEF. I think 23 it is toxic. 24 Gregg and I went to the same 25 university. We played football against</p>

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1 each other. We were both JCRC directors.
 2 And he, when I had my first child, he
 3 taught me things that -- you know, I've not
 4 that many close guys friends in my life, so
 5 I was happy to go out with Lisa's husband,
 6 Vasily, and have beers, etcetera.
 7 And then Gregg always seemed to
 8 have words of wisdom, and that worked. And
 9 as I left MEF and went on to one
 10 organization, and then another
 11 organization, and now managing director of
 12 an organization, it is, you know, asking
 13 for advice sometimes, and about parenting,
 14 about marriage, about work, about what he
 15 thinks is going to happen with the Iran
 16 deal should Joe Biden become the president,
 17 etcetera, etcetera.
 18 Q. So here when you said: He kept
 19 calling and texting, I just wanted some
 20 peace from it, you are talking about Gregg
 21 Roman calling and texting; is that correct?
 22 A. Are you reading this?
 23 Daniel said: Did you call
 24 Gregg saying that you were worried about...
 25 (witness reading). Was Monday -- what was

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1 the date of this message?
 2 Q. November 4.
 3 A. I was trying to keep an even, I
 4 believe at that point -- was it the day
 5 before the meeting? I didn't know -- yeah,
 6 I was trying to like keep an even keel, so
 7 to speak. I don't know if that's the
 8 expression. I didn't --
 9 Q. I'm just asking about these texts.
 10 Those texts that were sent, they were sent
 11 from Gregg Roman to you?
 12 A. These, no. This is a message I
 13 thought between Daniel and I.
 14 Q. Yeah. And you said: He keeps, he
 15 kept calling and texting. You were talking
 16 about Gregg Roman texting you, correct?
 17 You wanted some peace from it, it affected
 18 you so much?
 19 A. Oh, yeah, I guess so. And then --
 20 but, yeah --
 21 Q. What number was he texting from?
 22 A. I mean, he only has one phone
 23 number as far as I know. Or at least I
 24 only have one phone number for him. But
 25 the --

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1 Q. I have that number.
 2 A. What I said there, I said: I
 3 didn't know what was happening, I wasn't
 4 ruling anything out, that's how I felt.
 5 Q. Have you produced those texts?
 6 A. What is that?
 7 Q. In this case? Have you given those
 8 texts to your lawyers?
 9 A. The day I left MEF I switched phone
 10 numbers. I got a new phone. I wanted to
 11 move on with my life completely. I moved
 12 out of the state. I wanted it all behind
 13 me.
 14 Q. Have you given those text messages
 15 to anyone?
 16 A. No. I don't have them, is what
 17 I'm -- is the short answer of it.
 18 Q. What did they say? What was the
 19 texting?
 20 A. No idea. I don't know.
 21 Q. Why did you want to limit your --
 22 THE COURT REPORTER: Mr.
 23 Carson, I can't hear you. I'm sorry.
 24 Q. Why did you want to limit your
 25 interactions with Gregg after the November

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1 5th, 2018 meeting?
 2 A. Well, it was obvious. They
 3 believed that I was -- I was, would forever
 4 be allegiant to him, and that would mean
 5 that they didn't trust me and that would be
 6 the end of my ability to execute my duties.
 7 Q. So you wanted to limit your
 8 interactions with Gregg because of the
 9 women who accused him? I didn't understand
 10 your answer. What did you mean?
 11 A. I just wanted to get back to work.
 12 I just wanted to go back to the way
 13 everything was before everything broke out.
 14 And it was easier for me not to have to,
 15 have to deal with that. So it was like see
 16 no evil, speak no evil, hear no evil. I
 17 just wanted everything over and done with
 18 and to move on.
 19 And apparently nothing
 20 remotely, being physically out of the
 21 office wasn't good enough. Even when I
 22 tried to do more than that, that wasn't
 23 good enough either. That was unnecessary.
 24 If it sounds confusing, it is
 25 because it is. They wanted him gone

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<p>1 completely, and I didn't help make him go 2 as fast as they desired, and so when I 3 finally did do that, that was unnecessary. 4 There was no reason for that. Everybody 5 was completely fine talking to Gregg, 6 working with Gregg on a continuing basis. 7 Q. So Daniel Pipes says: I respect 8 your disappointment and anger vis-à-vis 9 Gregg, but you -- 10 THE COURT REPORTER: I'm sorry. 11 Q. I'll read slower. 12 THE COURT REPORTER: Thank you. 13 Q. I respect your disappointment and 14 anger vis-à-vis Gregg, but you agree that 15 its best for us, it is best for us for him 16 to continue on, so I am hoping that you 17 will be okay to deal with him on a strictly 18 business basis on fund raising, which is 19 one of his two main portfolios. 20 So it didn't really matter, 21 right? Daniel Pipes wasn't going to work 22 with Gregg anyway after that, the November 23 5th meeting? 24 A. What is the question? 25 MR. WALTON: Hold on. Is that</p>	<p>1 me. Somebody to be told, oh, somebody who 2 is your friend, somebody you have known and 3 worked with for years, isn't, you know -- 4 MR. WALTON: Next question. 5 Let's go. Come on. Give us a question. 6 THE WITNESS: Obviously, it was 7 better for Gregg to be with the 8 organization, the same logical conclusion 9 that Lisa and everybody else ended up with 10 when they invited him back after I left. 11 It is better for Gregg to be with the 12 organization, we're more likely to succeed, 13 we're more likely to get bonuses, and more 14 likely not to have to deal with nitpicking 15 of work, between all the people that are 16 involved in D.C., overseas, writing 17 fellows, Daniel. 18 Yes, it is obvious. And I 19 agreed with that, because that's the bottom 20 line, it is the reality of the situation. 21 MR. WALTON: Can I ask the 22 court reporter to calculate the amount of 23 time that we have been on the record? 24 Go ahead, Seth. 25 MR. CARSON: It has been about</p>
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<p>1 a question? Or do you want him to read Dan 2 Pipes' line back from November 2018? 3 Q. Yeah. Daniel Pipes expressed to 4 you that he needed Gregg to stay on the 5 organization, right? 6 MR. WALTON: Well, it says it 7 right there in the e-mail. 8 Q. Right? 9 MR. WALTON: These are the most 10 redundant, stupid questions I have ever 11 heard, I got to be honest with you. 12 THE WITNESS: Truth of the 13 matter, truth of the matter is, is nobody 14 is as good as Gregg. He can raise money 15 better than people. He can deploy 16 intellectual content better than people, 17 influence policy better than people. 18 So, yeah, I thought I could do 19 it in time, I thought, yeah, I definitely 20 would be able to do that. In that moment, 21 yeah, he is the one to do it. The best one 22 at doing it. He was always the best one at 23 doing it. And I looked up to his ability 24 to do it. 25 And that's what was hard for</p>	<p>1 six hours. 2 THE COURT REPORTER: I couldn't 3 hear you, Mr. Carson. 4 MR. CARSON: I said it has been 5 about six hours. But you can definitely 6 check. 7 THE COURT REPORTER: Jennifer, 8 do you have the ability to do that? I'll 9 need to go off the record for a few minutes 10 to calculate it. 11 THE VIDEO SPECIALIST: I don't. 12 Do we want to go off the record for a 13 couple minutes? 14 MR. CARSON: We started at 15 11:15, so it has been seven hours, not 16 including the probably hour and 15 minutes 17 of breaks or whatever. It has probably 18 been about five and a half to six hours so 19 far. 20 MR. WALTON: Listen, I don't 21 want to hold up the deposition further, but 22 I would like an official count at some 23 point. Let's go forward. 24 THE COURT REPORTER: Is that 25 Mr. Gold speaking or Mr. Walton?</p>

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<p>1 MR. WALTON: I'm sorry, 2 Eleanor. It is Dave. It's Mr. Walton. 3 (Discussion off the record.) 4 BY MR. CARSON: 5 Q. What is MEFO? 6 A. The website, Middle East Forum 7 online. 8 Q. Do you know anything about Lisa 9 Barbounis going to Europe in June of 2018? 10 A. I know she went to Europe. I'm not 11 sure when all this stuff happened, said she 12 hurt her eye and whatever. But I think 13 there was a guy there she was seeing. 14 Q. I don't want you to testify to 15 anything unless you have knowledge of it 16 directly. So I'm asking about your 17 knowledge of her going specifically in June 18 of 2018? 19 A. Do I know -- 20 MR. GOLD: Is the question, is 21 it confirmed -- hold on a second. 22 THE COURT REPORTER: Excuse me. 23 MR. GOLD: Is the question to 24 have him confirm that she went there, is 25 that your question?</p>	<p>1 moneys were given to that? I mean I can't, 2 I can't say for sure. I mean I would say-- 3 MR. GOLD: No guessing. We 4 will be here forever. You have been 5 speculating all night. Just answer the 6 question and move to the next question. We 7 are on the Dr. Phil show here. 8 Q. So you didn't have any direct -- 9 you didn't work on that campaign directly? 10 You weren't involved in the money that MEF 11 granted to that campaign; is that right? 12 A. I don't recall being, no, I don't 13 recall being involved in it. 14 Q. Do you recall whether Ms. Barbounis 15 had permission from Daniel Pipes to work 16 with Tommy Robinson? 17 A. Did she have permission from Daniel 18 to work specifically with like that guy? 19 Q. Yes. 20 A. I'm not sure if, I'm not sure if 21 Daniel knew about that. But, I mean, if it 22 was political, it would have been seen as a 23 no-no because it is a (c)(3) and you can't 24 cross politics, you know. 25 MR. WALTON: Mr. Bennett, yes,</p>
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<p>1 BY MR. CARSON: 2 Q. Yeah. Do you know whether she went 3 there in June of 2018? 4 A. I know she went to Europe, I don't 5 know the exact dates. That's it. 6 Q. Do you know why she went there the 7 very first time? 8 A. I believe it was Tommy Robinson, it 9 was like a project or she was working on 10 something related to that. And I think her 11 and Tricia traveled there to participate in 12 a rally or something. Maybe she went first 13 alone. Then on her next trip her and 14 Tricia went. I'm pretty sure it was 15 related to Tommy Robinson. 16 Q. Do you know anything about money 17 that the Middle East Forum gifted to the 18 Tommy Robinson, the free Tommy Robinson 19 campaign? 20 A. Money gifted to the campaign? I 21 mean -- 22 Q. Through the MEF? 23 A. I mean, through the education fund 24 there were grantees, there was moneys 25 distributed. But do I recall if specific</p>	<p>1 or no, or I don't know. We will be here 2 forever. Yes, or no, or I don't know. 3 MR. CARSON: I'm fine with a 4 yes, no, or I don't know to every one of 5 these questions. 6 BY MR. CARSON: 7 Q. So if someone works for a (c)(3) 8 they can also -- what did you call it, a 9 (c)(3)? 10 A. A 501(c)(3) organization. 11 Q. 501(c)(3). If someone works for a 12 501(c)(3), it doesn't mean that they can't 13 work for another organization on their own 14 time, correct? 15 A. No, if it is on their own time, 16 then I guess it would be okay. If it is on 17 the company's time, that would be 18 problematic. 19 Q. Right. So did Daniel Pipes ever 20 tell you that he was aware that Lisa was 21 working with Tommy Robinson? 22 A. No. 23 Q. What? 24 A. No. 25 MR. WALTON: I would like to</p>

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<p>1 take a break shortly to get an official</p> <p>2 tally of the time.</p> <p>3 MR. CARSON: I think I'm almost</p> <p>4 done, but you can take a break and do that</p> <p>5 if you want to.</p> <p>6 MR. WALTON: Yeah. Let's do</p> <p>7 that now. Let's go off the record.</p> <p>8 (Recess taken.)</p> <p>9 THE COURT REPORTER: I have</p> <p>10 seven hours and 20 minutes.</p> <p>11 MR. WALTON: Seth, you are</p> <p>12 over, buddy.</p> <p>13 MR. CARSON: No, we are not.</p> <p>14 That's not on the record. We started at</p> <p>15 11:15.</p> <p>16 MR. WALTON: Seven hours and 20</p> <p>17 minutes on --</p> <p>18 MR. CARSON: That's not on the</p> <p>19 record. That's total time that we have</p> <p>20 been here today. We started at exactly</p> <p>21 11:15 --</p> <p>22 MR. WALTON: No, it is not.</p> <p>23 MR. CARSON: Yeah, it is.</p> <p>24 THE COURT REPORTER: Guys --</p> <p>25 MR. WALTON: We are not on the</p>	<p>1 would like it sent by e-mail, a regular</p> <p>2 mini-script and a regular deposition.</p> <p>3 THE COURT REPORTER: Would you</p> <p>4 like the witness to read and sign?</p> <p>5 MR. GOLD: No.</p> <p>6 (Proceedings conclude at 7:39</p> <p>7 p.m.)</p> <p>8 - - -</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 record here, so don't worry about it.</p> <p>2 (Discussion off the record.)</p> <p>3 MR. CARSON: I'm going to ask</p> <p>4 one more question.</p> <p>5 MR. WALTON: No. I mean, I</p> <p>6 object to that. We are over.</p> <p>7 MR. GOLD: We are done.</p> <p>8 MR. WALTON: It's Sid's call.</p> <p>9 MR. CARSON: Just remember that</p> <p>10 you guys did like eight hours with Lisa.</p> <p>11 MR. WALTON: I don't --</p> <p>12 MR. GOLD: Lisa is a plaintiff.</p> <p>13 This guy is not a party in this lawsuit.</p> <p>14 This is limited to the Barbounis case.</p> <p>15 MR. CARSON: Okay. Cool. We</p> <p>16 will just call him back in McNulty and I'll</p> <p>17 finish the next time.</p> <p>18 MR. GOLD: Thank you very much</p> <p>19 everybody.</p> <p>20 MR. WALTON: Thank you. You</p> <p>21 can go, Matt.</p> <p>22 THE COURT REPORTER: Is counsel</p> <p>23 going to tell me what you would like for a</p> <p>24 transcript and when.</p> <p>25 MR. GOLD: Just a regular. I</p>	

I N D E X

DEPONENT: MATTHEW BENNETT PAGE
Examination by Mr. Carson 4

E X H I B I T S

BENNETT DEPOSITION EXHIBITS

Exhibit 1 - Barbounis complaint

Exhibit 2 - Message saved as Exhibit 10

Exhibit 3 - Message saved as Exhibit 11

(Exhibits retained by Mr. Carson.)

CERTIFICATE OF REPORTER PAGE 343

1 Commonwealth of Pennsylvania)
2 Chester County)
3
4

5 CERTIFICATE OF REPORTER
6

7 I, Eleanor J. Schwandt, Registered
8 Merit Reporter and Notary Public, do hereby
9 certify that the foregoing record, pages 1 to
10 355 inclusive, is a true and accurate
11 transcript of my stenographic notes taken on
12 November 10, 2020, in the above-captioned
13 matter.
14

15 IN WITNESS WHEREOF, I have hereunto
16 set my hand and seal this 16th day of
17 November, 2020.
18
19

20 *Eleanor Schwandt*

21 Eleanor J. Schwandt
22
23
24
25

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digest (1)	doing (34)	eaten (1)	et (2)
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dinners (1)	domestically (1)	effect (1)	ethic (1)
direct (17)	done, (1)	efficiency (1)	Europe (3)
directed (1)	donor (6)	eight (1)	evening (3)
directing (1)	donors (7)	either (26)	event (7)
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directly (8)	doors (3)	Eleanor (13)	eventual (1)
director (50)	dope (1)	electromagnetic (1)	eventually (1)
directors (3)	dork (18)	electronic (3)	Everest (3)
director's (4)	dork, (1)	else's (2)	everybody (66)
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disagree (1)	doubt (3)	e-mailed (2)	everyone's (1)
disalarmed (1)	download (1)	e-mailing (1)	evidence (10)
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disappointed (9)	downstairs, (1)	Eman (8)	exact (5)
disappointment (6)	downtime (1)	embarrass (1)	exactly (18)
disarray (1)	dozens (2)	embarrassed (1)	exaggerated (2)
disbelieve (1)	Dpipes@gmail (1)	emergency (1)	exaggerating (3)
disconnect (1)	Dr (3)	emotional (12)	EXAMINATION (5)
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dissidents (1)	dumb (1)	enemy (2)	exhibit (14)
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distinction (1)	duration (1)	engagement (1)	exists (4)
distinctions (1)	duties (1)	engages (1)	expect (2)
distress (1)	dwalton@cozen.com	English (1)	expected (2)

expense (2)
 expenses (1)
 experience (2)
 experienced (1)
 expert (4)
 explain (5)
 explained (2)
 Explicitly (1)
 exploded (1)
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 Facebook (4)
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 facilitate (2)
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grievances (1)	headphones (1)	hotel (16)	include (2)
gripe (1)	heads-up (1)	hotels (1)	included (4)
gripes (5)	health (1)	hour (7)	includes (1)
Groman@gmail (1)	hear (28)	hours (13)	including (2)
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guidelines (1)	heaviest (1)	hundreds (3)	incorrectly (1)
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guys (35)	held (9)	hurtful (1)	independent (2)
< H >	hell (1)	hurting (1)	indicated (1)
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hacked (3)	help (11)	Hyatt (1)	individual (1)
hacks (1)	helpful (3)	hypothetical (4)	individuals (1)
half (2)	helping (1)	hypotheticals (2)	infinite (1)
Halloween (2)	hereunto (1)	< I >	influence (5)
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handbook (1)	hey (16)	ideas (2)	information (25)
handed (2)	Hi (1)	identification (1)	informed (3)
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handled (4)	hierarchy (1)	idiot (3)	ingrained (1)
handling (1)	high (2)	ignored (1)	in-house (1)
hands (4)	higher (5)	ignoring (1)	initial (1)
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hanging (2)	highlighted (2)	illegitimate (1)	initiative (1)
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happenings (2)	hold (15)	imparted (1)	inside (5)
happy (21)	holding (1)	implement (3)	insinuate (1)
harass (6)	holds (1)	implication (5)	insinuating (2)
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	home (8)		instinct (2)

instruct (2)	< J >	knowing (6)	level (6)
instructed (2)	janitor (1)	knowledge (26)	leveled (1)
instructing (1)	January (12)	known (5)	levels (1)
instruction (1)	Jason (1)	knows (2)	leverage (1)
intellectual (2)	JCPA (1)	< L >	liaison (1)
intend (1)	JCRC (2)	lacks (1)	liar (1)
intent (1)	JENNIFER (3)	Lane (1)	Liberty (1)
interacting (3)	jeopardize (1)	language (1)	Libre (3)
interaction (1)	jeopardized (1)	lap (3)	licensed (1)
interactions (5)	jeopardy (2)	Lara (16)	lie (4)
interest (7)	jerk-off (1)	Lara's (4)	lied (2)
interested (2)	Jersey (2)	large (1)	lies (8)
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internship (10)	jobs (8)	Laura (11)	limit (6)
interrupt (13)	Joe (1)	Laura's (1)	limited (2)
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interview (6)	judge (8)	lawsuits (3)	link (1)
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intimate (6)	Judy (1)	lawyers (6)	LISA (142)
intimidated (1)	July (3)	lay (1)	LisaBarbounis@gmail
intimidating (1)	jump (2)	lead (2)	(1)
introduced (5)	jumping (1)	leader (5)	Lisa's (14)
intuitive (1)	June (8)	leadership (2)	list (20)
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invitation-only (1)	Kassam (5)	Leah (37)	listing (1)
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inviting (1)	keeps (1)	learned (11)	lived (1)
involved (9)	kept (8)	learning (2)	livelihood (2)
iPad (3)	Kevlar (1)	leave (14)	lives (7)
Iran (3)	key (2)	leaving (4)	living (1)
irresponsible (1)	kid (3)	Lee (9)	lobbing (2)
ISIS (6)	kidnaped (1)	Lee's (2)	local (5)
Islamic (2)	kind (9)	left (50)	locate (1)
Islamism (1)	kinds (2)	legal (4)	located (1)
Islamist (1)	kitchen (2)	legitimate (1)	location (4)
Israel (50)	knew (35)	legs (1)	locations (1)
Israeli (1)	knife (2)	LEIGH (2)	logical (7)
issue (5)	knock (1)	letter (31)	logically (1)
issues (6)	know (576)	letters (1)	login (2)
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its (2)			logistically (1)

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love (1)
lower (1)
lowest (2)
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lunch (10)
lurch (1)
luring (2)
LUU (2)
lying (8)

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Marc (2)
March (20)
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Market (6)
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marriage (2)
Marseille (1)
master's (1)
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M-A-T-P (1)
Matt (65)
MattBennett@gmail
 (1)
matter (20)
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MATTHEW (7)
M-A-T-T-H-E-W (1)
M-A-T-T-P-B-E-N-N-E
-T-T (1)
Mattpbennett@gmail.c
om (1)
McNulty (20)
McNulty's (2)
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minutes (16)
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mm-hmms (1)
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monster (1)
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mother's (2)
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Move (15)
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natural (7)
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NDAs (13)
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need (28)
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negligent (1)
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nightclub (1)	O'Connor (1)	overall (1)	people (103)
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nighttime (1)	odd (4)	overseas (2)	pepper (3)
nitpicking (1)	offended (1)	overstepped (2)	percent (4)
No, (1)	offer (3)	overstepping (1)	percentage (1)
Nods (1)	offered (1)	< P >	perception (1)
nOg (3)	office (90)	P.C (1)	perfectly (1)
noise (1)	officer (1)	p.m (1)	performing (1)
non (2)	offices (2)	packet (3)	permission (3)
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obtaining (1)	original (5)	pay (7)	player (2)
obvious (4)	originally (2)	paying (2)	playing (1)
obviously (26)	other's (1)	PDF (1)	please (21)
Occasionally (1)	outed (1)	peace (2)	plenaries (1)
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 Registered (2)
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 SethDCarson@gmail
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Zionist (1)
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